



LDWSF
12.3.357.1v1
02/24/09

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
TTY 711 or 800-833-6388 (for the speech or hearing impaired)

February 24, 2009

Danielle de Clercq
Cleanscapes Inc
5939 4th Ave S
Seattle WA 98108

Dear Danielle de Clercq:

**RE: Transfer of Ownership for Coverage Under Ecology's General Stormwater Permit
Associated with Industrial Activity.**

Permit number:	SO3-000949
Former Facility Name:	Puget Sound Truck Lines
New Facility Name:	Cleanscapes Inc
Location:	7303 8 th Ave S Seattle, Washington 98108

The Department of Ecology (Ecology) has received your transfer of ownership form and updated application for permit number SO3-000949. Thank you for notifying Ecology of the changes. Our records have been updated to reflect the changes and show Cleanscapes Inc as the new owner effective 02/24/2009.

Enclosed, please find the Industrial Stormwater General Permit. Please retain this transfer of ownership letter with the permit and keep them with your Stormwater Pollution Prevention Plan (SWPPP). This letter addresses only the most significant changes to the permit, please take the time to review the conditions of this new permit in detail.

Monitoring Requirements:

This permit requires sampling and analysis of stormwater from your facility. Please read this letter and the attached "Industrial Stormwater General Permit – Site Coverage" carefully to understand which parameters have a sampling requirement. You are required to file a sampling report, called a Discharge Monitoring Report (DMR), within 45 days of the end of each sampling period. Your first sampling period will be 1st Quarter (Jan, Feb, Mar of 2009) and your first sampling report must be filed by 05/15/2009. Ecology will send you the official DMR form under separate cover.

1. All permittees are required to sample for the "basic four" parameters of pH, turbidity, total zinc, and petroleum oil and grease;

USEPA SF



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Danielle de Clercq

02/24/2009

Page 2 of 3

2. You may be required to sample for additional parameter(s) based on:
- The Standard Industrial Code (SIC Code) that describes your industry,
 - The receiving water's status on the impaired [303(d)-listed] water body list, or
 - The receiving water's status under TMDL (total maximum daily load) planning requirements.

Some receiving waters have TMDLs for specific parameters which you do not have to sample. However, you are required to identify sources of these specific parameter(s), implement the associated BMPs (Best Management Practices) and document them in your Stormwater Pollution Prevention Plan (SWPPP). This will meet the requirements of the TMDL.

Monitoring Results above Benchmarks:

If your monitoring results are above the benchmark values, you are required to take appropriate action. Please see special permit condition S4.C on page numbers 24-27 of the permit.

Our records indicate that your stormwater discharges to a waterbody listed as impaired. Impaired means that the waterbody is not meeting surface water quality standards. In addition to the monitoring already required based on your SIC code, you will also need to sample for the pollutant(s) or parameter(s) causing the problems. Duwamish Waterway is listed for the parameter(s) listed in the table

Parameter	Units	Analytical Method(s)	Benchmark Value	Minimum Sampling Frequency
pH	Standard Units	A meter must be used if the parameter is 303(d) listed	6.5-8.5	Quarterly

Update your SWPPP as necessary. All parameters and BMPs must be addressed in the SWPPP. You must also evaluate and update your SWPPP as necessary to show any changes in operational or source control BMPs. Your permit also requires four visual inspections of stormwater during wet weather and one during the dry season. You must include documentation of these inspections in your SWPPP.

Danielle de Clercq

02/24/2009

Page 3 of 3

For technical assistance regarding stormwater discharging from your site please contact Greg Stegman (425-649-7019) of the Department of Ecology's Northwest Regional Office in Bellevue. For questions regarding permit fees, contact Bev Poston at (360) 407-6425. If you have any questions regarding this letter, call Josh Klimek at 360-407-7451 or e-mail at jokl461@ecy.wa.gov.

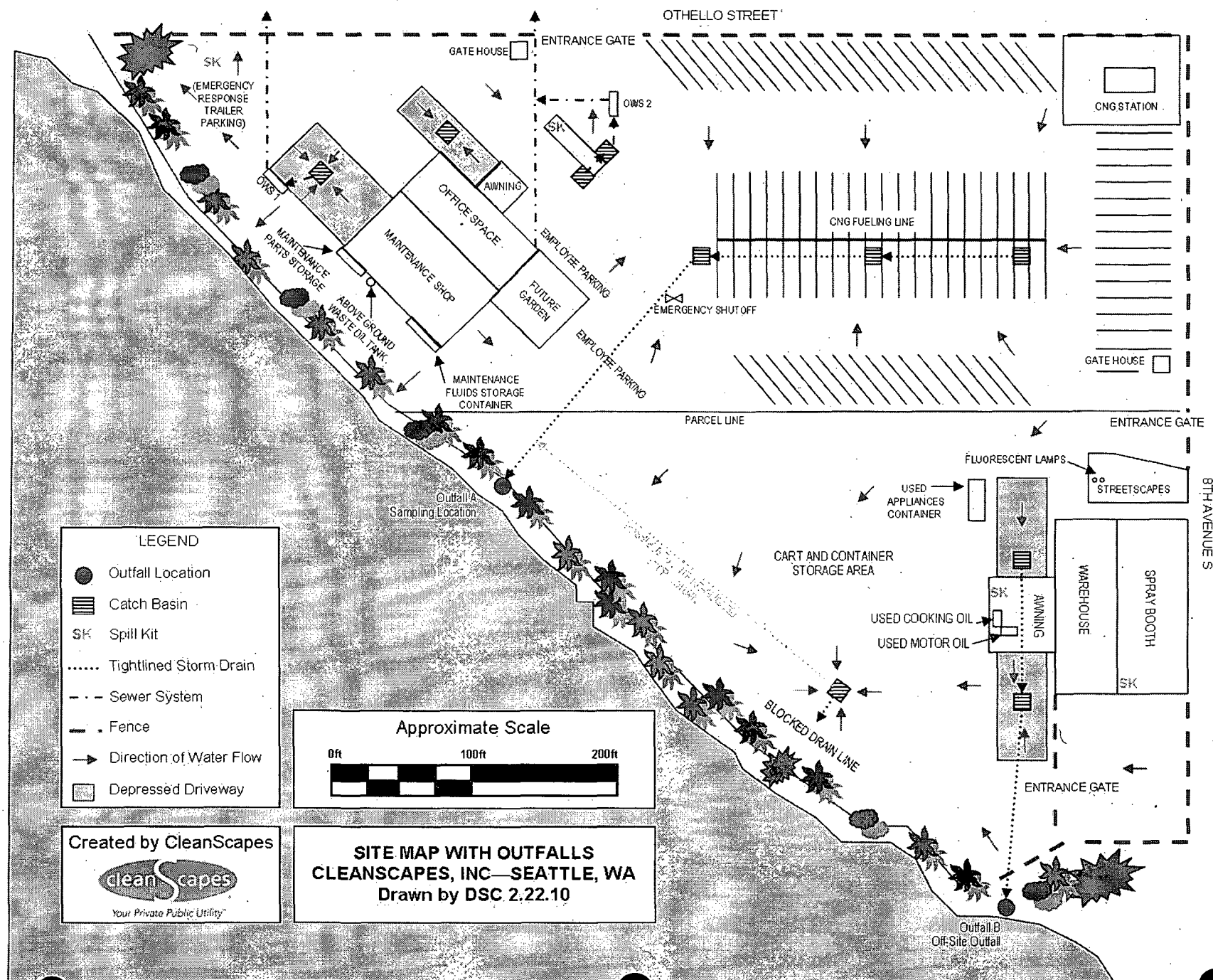
Sincerely,

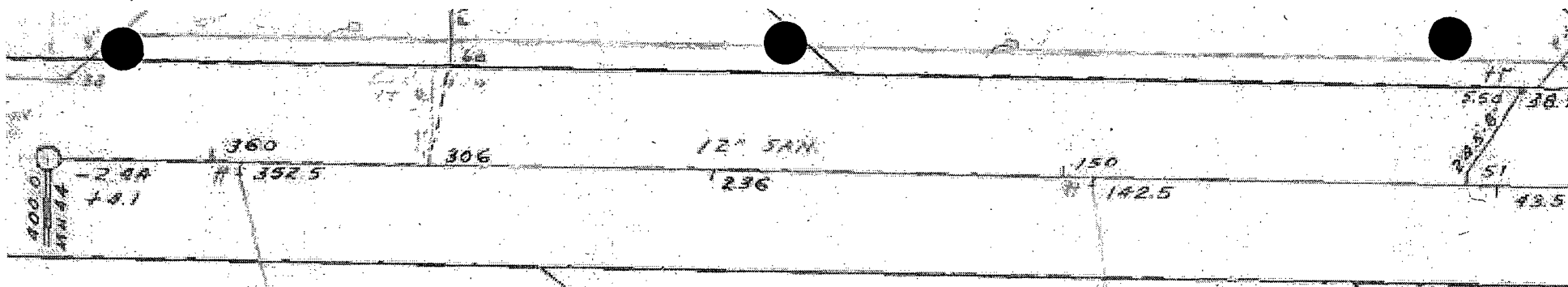
A handwritten signature in dark ink, appearing to read "Bill Moore", with a stylized, flowing script.

Bill Moore, P.E., Section Manager
Program Development Services
Water Quality Program

Enclosures

cc: Ecology Permit Fee Unit, HQ
Stormwater File, HQ





Oil Separator

WASH
RACK
GROUP

7303
8TH AVE S.

730

DUWAMISH INDUSTRIAL ADD.

**Industrial Stormwater General Permit National Pollutant Discharge Elimination System (NPDES)
Discharge Monitoring Report (DMR)**

Site Name: CLEANSAPES INC		WAR000949	A
Site Address: 7303 8th Ave. S.		Permit Number	Sampling Point
City: Seattle	County: King		

Submit one DMR per sampling point.

Reporting Period			
Quarter (circle one)		Year: 2010	
1 st	2 nd	3 rd	4 th
Jan/Feb/Mar	Apr/May/Jun	Jul/Aug/Sept	Oct/Nov/Dec

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level	Sample Results			
					SINGLE SAMPLE RESULT	SINGLE SAMPLE DATE (MM/DD)	AVERAGE (If more than one sample collected, complete additional sampling log on next page.)	CONSISTENT ATTAINMENT? (Condition 54.B.6) (✓ for yes)
Turbidity	NTU	25	EPA 180.1, Meter	0.5	301	3/11/2010		<input type="checkbox"/>
pH	s.u.	5 - 9	Meter	±0.5	6.5	3/11/2010	N/A	<input type="checkbox"/>
Zinc, Total	µg/L	117	EPA 200.8	2.5	268	3/11/2010		<input type="checkbox"/>
Oil Sheen	Yes/No	No visible oil sheen	N/A	N/A	Sheen Present? Yes (No) (circle)	3/11/2010	N/A	N/A
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0	80.0	3/11/2010		<input type="checkbox"/>

☐ No sample collected – No stormwater was discharged during normal working hours.

☐ No sample collected – Stormwater was discharged during normal working hours, but a sample wasn't collected (explain in comments section).

ADDITIONAL COMMENTS:

Certification Statement: I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name / Title (printed)	Signature (not valid unless signed). See Permit Condition G2 for signature requirements.	Date Signed
------------------------	--	-------------

Stormwater Pollution Prevention Plan (SWPPP)

for:

CleanScapes, Inc.
7303 8th Avenue South
Seattle, WA 98108
(206) 859-6700

SWPPP Contact(s):

Danielle de Clercq
5939 4th Avenue South
Seattle, WA 98108
(206) 859-6716 p
(206) 658-4074 f
danielle.declercq@cleanscapes.com

SWPPP Preparation Date:

February 2010

Contents

Section 1. Facility Description and Contact Information.....	1
1.1 Facility Information	1
1.2. Contact Information/Responsible Parties	2
1.3. General Location Map	3
1.4. Site Map	3
1.5. Stormwater Pollution Prevention Team	4
Section 2. Facility Assessment	5
2.1. Facility Description	5
2.2. Industrial Activity, Materials Inventory, and Associated Pollutants	6
2.3. Spills and Leaks	9
Section 3. Best Management Practices (BMPs)	11
3.1 Operational Source Control BMP	11
3.2. Structural Source Control BMPs.....	24
3.3. Treatment BMPs.....	28
3.4. Stormwater Peak Runoff and Volume Control BMPs	29
3.5. Erosion and Sediment Control BMPs	29
Section 4. Sampling Plan	31
Section 5. SWPPP Certification	36
SWPPP Appendices.....	37
Appendix A. Location Map.....	i
Appendix B. Site Map	ii
Appendix C. Blank Worksheets for Development of the SWPPP.....	1
Appendix D. SWPPP Certification Form	1
Appendix E. SWPPP Training Materials	
Appendix F. Industrial Stormwater Monthly Inspection Report & Yard Duties Daily Checklist	1

Section 1. Facility Description and Contact Information

1.1 Facility Information

Facility Information

Name of Facility: CleanScapes, Inc.
Street: 7303 8th Avenue South
City: Seattle, WA 98108
County: King
Permit Number: WAR SO3-000949

Latitude/Longitude:

Latitude: 42° 32' 09" to 12"
Longitude: -122° 19' 22" to 32"W

Estimated area of industrial activity at site exposed to stormwater: 6.33 acres

Discharge Information

Does this facility discharge stormwater into surface waters? ☒ Yes ☐ No

Does this facility discharge stormwater into a municipal storm water conveyance system? ☒ Yes ☐ No

SIC Code(s): 4212 Transportation (Trucking without storage)

1.2. Contact Information/Responsible Parties

Facility Operator (s):

Name: CleanScapes, Inc
Address: 5939 4th Avenue South
City, State, ZIP: Seattle, WA 98108
Telephone: (206) 859-6700
Fax number: (206) 859-6701

Facility Owner (s):

7303 8th Ave S (Building in NW corner of yard)
Name: R&A Properties, LLC
Address: 18325 SE 145th Street
City, State, Zip: Renton, WA 98059
Telephone: (425) 271-0331
Email: (b) (6)

7401 8th Ave S (Building in SE corner of yard)
Sandra L Campbell, Successor Trustee
Name: Charles M Campbell Family Trust
Address: 11019 NE 104th Street
City, State, Zip: Kirkland, WA 98033
Email: (b) (6)
A. Talbot Campbell Jr
15544 SE 8th Street
Bellevue, WA 98008

SWPPP Contact:

Name: Danielle de Clercq, VP Operations Administration
Office Phone: (206) 859-6716
Cell Phone: (b) (6)
Email: danielle.declercq@cleanscapes.com
Fax: (206) 658-4074

1.3. General Location Map

The CleanScapes site is located at 7303 8th Avenue South, in Seattle, Washington, near the intersection of 8th Avenue South and Othello Avenue South. The site is located southwest of Seattle's city center in the industrial area of the Georgetown Neighborhood. The entire site covers 6.33 acres, of which approximately 99% is paved with asphalt (or covered by buildings). The remainder is along the Duwamish River bank and consists of riprap (primarily concrete) covered with vegetation.

Neighbors to the north include Seattle Iron and Metals, a metals recycling facility that abuts the CleanScapes yard. Storage and e-waste recycling activities are done in the warehouse across from the site on Othello. First Student school buses are operated out of the property across from the CleanScapes site on 8th Ave South.

For aerial photo of site and surrounding area see Appendix A.

1.4. Site Map

A site map is included in Appendix B.

1.5. Stormwater Pollution Prevention Team

POLLUTION CONTROL TEAM	
LEAD:	
Name and title:	Danielle de Clercq, VP of Operations Administration
Office Phone:	(206) 859-6717
Cell Phone:	(b) (6)
Responsibilities:	Responsible for storm system maintenance, sampling, and inspection, the SWPPP, and yard maintenance.
MEMBERS:	
Name and title:	Don Kusler, Safety Manager
Office Phone:	(206) 658-4065
Cell Phone:	(b) (6)
Responsibilities:	Responsible for training all employees in health and safety requirements under law, documenting all training, and making Spill Response plan and reporting forms available to all personnel. Responsible for spill responses due to accidents or mechanical failures.
Name and title:	John Silva, Maintenance Manager
Office Phone:	(206) 859-6856
Cell Phone:	(b) (6)
Responsibilities:	Responsible for vehicle maintenance and inspections, all mechanical materials including fluids stored in maintenance bay and fluid containers. Responsible for spill response due to container failure.
Name & Title:	Schuyler Charf, Asset Controller
Office Phone:	(206) 859-6854
Cell Phone:	(b) (6)
Responsibilities:	Responsible for developing and researching new housekeeping and spill response protocols and materials. Performs monthly and ad-hoc yard inspections. Reviews spill training materials to confirm they meet SWPPP requirements.
Name & Title:	Mark Eaton, Streetscapes Operations Controller and Account Manager
Office Phone:	N/A
Cell Phone:	(b) (6)
Responsibilities:	Train yard employees in spill prevention and good housekeeping. Update yard checklist as needed. Perform ad-hoc yard inspections to improve yard employee performance. Provide crews to assist in spill cleanups.
EMERGENCY RESPONSE AND SPILL CLEANUP, IF NEEDED:	
Environmental Recovery Service:	Bravo Environmental (425) 424-9000 NRC Environment (800) 337-7455 PSC (877) 577-2669
Water Spill Response:	Global Diving and Salvage (206) 623-0621

Section 2. Facility Assessment

2.1. Facility Description

Industrial Activity:

CleanScapes is a transportation facility with a maintenance shop. The facility's SIC code is 4212 (trucking, without storage). Stormwater from the site discharges to surface waters. CleanScapes collects municipal solid waste, including trash, recycling, and yard/food waste for the City of Seattle and the City of Shoreline. The site is used as CleanScapes' operations center. Exterior areas are used primarily for fleet parking and container storage. Industrial activities covered under the permit include vehicle maintenance, mobile vehicle washing, mobile fueling, and Compressed Natural Gas (CNG) fueling operations.

Regular Business Hours: The facility is open 24 hours a day, 7 days a week, 365 days a year. The primary 8-hour shift is Monday through Friday. There are several other shifts with fewer employees, staggered throughout the day and week, in order to meet customer collection needs. All shifts are dictated by customer collection schedules. There are minimal seasonal variations in shifts or workflow. Inclement weather may affect operations by postponing collections.

General Layout:

There are three buildings on the site.

- Building in NW corner of site (7303 8th Ave S) - houses the main collections operations office and maintenance shop. Facility offices are located on two floors in southeastern corner of building. The three-bay maintenance shop is in the western half of the building. Most of the building is one floor.
- Warehouse in SE corner of site (7401 8th Ave S) - is mostly unused, except for a paint booth in eastern bay which is used for painting containers. Some space is used for storage. Most of the building is one floor.
- Shed next to warehouse in SE corner of site (7401 8th Ave S property) - houses exterior janitorial services operations materials, mostly comprised of small equipment. The building is one floor.

One office trailer and one storage trailer are located just outside the eastern wall of the main building. The container stores employee uniforms. Two metal storage containers are located just outside the western wall of the main building. The first, in the northeast corner, stores tools and equipment. The second, located at the southeast corner, stores maintenance fluids, including oil and hydraulic fluid. An above-ground waste oil tank is located just to the south of the first container. There is one small metal container outside the northern wall of the main building which is used as a locker room. There are two guard shacks, one next to each entrance to the property.

Asphalt and concrete-paved areas surround all sides of the buildings, with the exception of a future garden directly southwest of the main building.

2.2. Industrial Activity, Materials Inventory, and Associated Pollutants

Facility operations include vehicle parking, general dumpster and cart transportation, vehicle maintenance, truck washing, container painting, and compressed natural gas and diesel vehicle fueling.

Industrial Activity	Associated Pollutants
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Loading or Unloading of Dry Bulk Materials or Liquids	Varies
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Loading or unloading of dry bulk materials or liquids for maintenance purposes occasionally occurs directly in front of the doors to the maintenance bays. Unloading of container paint occurs in front of the paint booth in the building in the southeastern corner of the lot.

Outdoor storage of materials or products	Zinc
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No outdoor storage of materials or products occurs during the transfer of dry bulk materials or liquids.

An inventory of plastic carts and metal dumpsters is stored on the property. Dumpsters are stored with their lids closed or on their sides so that rain water does not collect inside them. Dumpsters are inspected regularly, and are maintained to meet or exceed the State Minimum Function Standards, WAC 173-304-200 and container quality standards dictated by the City of Seattle contract. The specification sheet for the metal dumpsters are included in Appendix I. Propane-fueled forklifts are used to move dumpsters around.

A small inventory of new tires for the collection fleet is stored outside on a tire rack. When tires are replaced, the removed tires are placed on the same rack for approval and then removed the following day by TDS.

Outdoor Manufacturing or Processing	None
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No outdoor manufacturing or processing takes place, except for some minor welding work during the dry summer months.

On-site Dust or Particulate Generating Processes	None
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No dust or particulate generating processes take place except for minor welding work mentioned above. Any metal debris or dust is swept up regularly, whether he is working in- or outdoors.

On-site Waste Treatment, Storage, or Disposal	Varies – See Below
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Every effort is made to prevent the storage of municipal solid waste collected in the City of Seattle or Shoreline on site. With few exceptions, the collected recycle, yard waste, and trash loads on the trucks are transferred at the appropriate transfer station or disposal facility before the trucks come back to the yard. Liquids drips from the waste on the trucks are caught in a shelf at the back of the truck and emptied at the transfer stations. If a truck does come back to the yard with a load, it is dumped no later than the start of the next main shift. Any full containers pulled from a customer site (due to service changes or dumpster repair requests) and brought to the yard are dumped daily.

Office wastes are disposed of by placing garbage bags in one of the two dumpsters on the site that are collected twice-weekly by Waste Management. The dumpster lids are kept in place.

Paint containers are emptied completely (per "The Local Hazardous Waste Management Program in King County") and disposed of properly.

Recyclable materials are collected from both customers in Shoreline and Seattle and some are temporarily stored on site. These materials are listed below.



All of these recyclable items are stored under cover, with the exception of the lidded used appliance dumpster. No other hazardous materials, or hazardous or dangerous wastes (as defined by federal SARA and RCRA laws) are carried, shipped, or accepted by CleanScapes at any time.

Collected Recyclable Material	Associated Pollutants
Used kitchen grease/oil <ul style="list-style-type: none"> Storage: Stored outside, under cover, in a labeled, double-walled plastic container, with closed lid. Frequency of removal: As needed Removal: Removed by General Biodiesel and transported to their facility at 4034 W Marginal Way SW. The oil is recycled into biodiesel 	Cooking oil/grease
Used motor oil <ul style="list-style-type: none"> Storage: Stored outside, under cover, in a labeled, single-walled plastic container placed in secondary steel container. Frequency of removal: As needed Removal: Removed by Emerald Services, which also collects used motor oil and filters from the maintenance department. The oil is recycled. 	Petroleum
Appliances (except refrigerators and freezers, which are taken directly from customer pickup site to Total Reclaim) <ul style="list-style-type: none"> Storage: Stored outside in a lidded dumpster Frequency of removal: As needed Removal: Hauled by CleanScapes to Independent Metals and recycled for metal scrap 	Metals
E-waste (computers, printers) <ul style="list-style-type: none"> Storage: Not typically stored on site. Occasional stored for less than 24 hours inside, under cover. Frequency of removal: Daily, if anything is stored on site. Removal: Transported by CleanScapes to South Transfer Station to be 	Unknown

recycled.	
Fluorescent light bulbs <ul style="list-style-type: none"> Storage: Stored inside, under cover, in a labeled container provided by EcoLights. The container is made of thick cardboard siding, a metal bottom, and a thick cardboard lid. Frequency of removal: As needed Removal: Delivered by CleanScapes to EcoLights at 2200 6th Ave S to be recycled. 	Mercury

Industrial Activity

Associated Pollutants

Vehicle and Equipment Fueling, Maintenance, and/or Cleaning (includes washing)

Roughly half of the CleanScapes' truck fleet is powered by Compressed Natural Gas (CNG), and the other half is powered by diesel. Trucks are fueled on-site.

Compressed Natural Gas Vehicles and Fueling

CNG

Compressed Natural Gas (CNG) vehicles are fueled by hooking up to a static CNG line, which is connected to a CNG station (compressor and storage tank) in the NE corner of the yard. Clean Energy, Inc. maintains the CNG station and there is an Operations and Maintenance agreement on site. Terms of that contract outline Clean Energy's responsibility and liability for any leaks or other accidents that might occur, as well as any cleanup or remediation required. Since CNG is lighter than air and rises, the stormwater system will never be impacted by CNG.

Diesel Vehicles and Mobile Fueling

Petroleum

Diesel trucks are located furthest away from the storm drains. Mobile diesel fueling is contracted out to 4Refuel and is done daily. 4Refuel hooks a wet line to the trucks when they are in the yard. 4Refuel's contract outlines its responsibility and liability for any leaks or other accidents that might occur, as well as any cleanup or remediation required. Vehicles that need to be fueled before 4Refuel can be on site or after 4Refuel service hours are fuelled at a 1,000 gallon, double-walled, mobile diesel tank on site. The mobile tank is currently located between two drains that lead to an oil water separator which is hooked up to the sewer system. The mobile trailer includes a complete spill kit.

Maintenance

The maintenance department focuses on preventative maintenance (PM), which is done on-site in the maintenance bays. A rigorous PM schedule is followed to minimize oil, hydraulic, and other possible vehicle leaks and stormwater contaminants. A description of steps followed during the various PMs is kept on-site in the maintenance bay. Repairs are outsourced to a number of maintenance shops in the northwest. Tires are checked daily by TDS and replaced as needed.

Materials stored on-site, and under cover, inside the maintenance area, include new and used oil, used oil filters (stored in 2 55-gal drums), biodegradable vegetable-based hydraulic fluid, degreaser, and synthetic transmission fluid. No materials, including truck maintenance fluids or paint, are ever stored outside, even temporarily. Emerald Services of Seattle has been contracted to remove used oil filters and waste oil for CleanScapes, including emptying of the waste oil tank as needed.

Mobile Truck Washing

Biodegradable soap and vehicle grime

Mobile truck washing is performed on-site. Truck washing is contracted to Mr. Truck Wash of Redmond, WA. Each vehicle is washed completely once a week. Partial washes are scheduled for additional days based on truck type: daily for front load, twice a week for rear and side loaders. Biodegradable soap is used, and the wash water is captured for recirculation and disposal by the contractor. Mr. Truck Wash has its own stormwater protection and specification sheets, which are kept on-site.

Roofs or Other Surfaces Exposed to Air Emissions From Manufacturing or Process

None

There are no roofs or services exposed to air emissions from manufacturing or process.

Roofs or Other Surfaces Composed of Materials That May Be Mobilized by Stormwater.

Zinc

Two sides of the rectangular site are bordered by chain link fences. The third side is bordered by the Duwamish River. There is additional fencing around the compressed natural gas station and between the loading docks and park on the south end of the site. Gutters on the buildings are either galvanized pipe or PVC. Roof flashings are of galvanized material.

2.3. Spills and Leaks

2.3.1 Materials that may be Exposed to Precipitation or Runoff

Other than plastic carts, metal dumpsters, and tires, no materials are stored outside where they could be exposed to precipitation or runoff. Materials stored under cover, see Section 2.2, may be exposed to precipitation or runoff in case of puncture or accidental-spill while being unloaded and moved under cover.

2.3.2 Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
<p>Depressed Driveways/loading dock at SE building</p> <ul style="list-style-type: none"> A used-motor oil or cooking oil spill or break: if the spill is not contained, runoff to storm system is possible due to the proximity of the catch basins to the loading dock areas. A vehicle-related leak: If a significant leak from a pickup truck were to occur and the vehicle is parked close to a storm drain, the leaked fluid might reach the storm drain. 	Outfall B
<p>Maintenance Storage Container</p> <ul style="list-style-type: none"> A maintenance-related spill or container leak: if the spill is not contained on the southern portion of the maintenance bay, runoff to the river bank could be possible. 	Outfall A or river bank
<p>Paved Areas for vehicle traffic/parking</p> <ul style="list-style-type: none"> A vehicle-related leak: If a significant leak from an onsite vehicle were to occur and the vehicle is parked close to a storm drain, the leaked fluid might reach the storm drain. Lamps: If a lamp was not prepared according to collection standards and was broken, mercury could potentially reach the stormwater system. Truck washing: If Mr. Truck Wash did not capture the truck washing water, wash water would reach the storm drains. Wash water may contain particulates picked up from the road, in addition to engine, hydraulic, and lubrication fluids from the trucks. Fueling: Significant diesel fuel spills could reach the storm drains from vehicle refueling if not adequately or rapidly contained. 	Outfall A

2.3.3 Potential Sources of Pollutants from Past Activities, Materials, and Spills

Since operations began in March, 2009, there have been no significant spills at the CleanScapes yard. No reports of spills are on record at CleanScapes or at the WA State Department of Ecology. CleanScapes is not aware of any pollutants from past activities, materials or spills during the previous tenants' occupancy (prior to March, 2009) that were disposed of in a manner to allow ongoing exposure to stormwater.

Section 3. Best Management Practices (BMPs)

3.1 Operational Source Control BMP

Mandatory Operational Source Control BMPs required by condition S3. of the Industrial Stormwater General Permit:

Good Housekeeping:

Vacuum Sweep: Vacuum paved surfaces with a vacuum sweeper (or a sweeper with a vacuum attachment) to remove accumulated pollutants a minimum of once per quarter.

- Since April, 2009, accessible grounds have been swept once per week with a regenerative air and water-assisted vacuum sweeper
- Beginning in January, 2010, CleanScapes has been sweeping the yard once a month, and as needed, with large magnets attached to a pickup or forklift. The 3' long by 6" wide magnet aggressively picks up metals such as nails and screws.

Dust Control: Identify and control all on-site sources of dust to minimize stormwater contamination from the deposition of dust on areas exposed to precipitation.

- Dust is not generated by on-site processes, but dust enters the premises by air and on vehicles. Dust in the yard is controlled by sweeping the yard weekly with a regenerative air and water-assisted vacuum sweeper. See Vacuum Paved Surfaces section above. Dust that cannot be reached by the sweeper is also swept up or blown with a vacuum blower away from the storm drains and into areas swept by the sweeper.

Bag Houses: CleanScapes does not have any bag houses on site.

Dumpster Lids: Keep all dumpsters under cover or fit with a lid that must remain closed when not in use.

- All dumpsters are fitted with lids. The two dumpsters used for CleanScapes waste are kept closed when not in use. Dumpsters stored on site in order to meet City requirements are stored with lids closed or on their sides to prevent the collection of water.

Additional Good Housekeeping BMPs:

Operational Source Control BMPs for Loading and Unloading Areas for Liquid or Solid Material:

All Loading/Unloading Areas:

- A significant amount of debris can accumulate at outside, uncovered loading/unloading areas. Sweep these surfaces frequently to remove material that could otherwise be washed off by stormwater. Sweep outside areas that are covered for a period of time by containers, logs, or other material after the areas are cleared.
- Place drip pans, or other appropriate temporary containment device, at locations where leaks or spills may occur such as hose connections, hose reels and filler nozzles. Drip pans shall always be used when making and breaking connections (see Figure 2.2). Check loading/unloading equipment such as valves, pumps, flanges, and connections regularly for leaks and repair as needed.

Tanker Truck and Rail Transfer Areas to Above/Below-ground Storage Tanks:

- To minimize the risk of accidental spillage, prepare an "Operations Plan" that describes procedures for loading/unloading. Train the employees, especially fork lift operators, in its execution and post it or otherwise have it readily available to employees.
- Report spills of reportable quantities to Ecology).
- Prepare and implement an Emergency Spill Cleanup Plan for the facility (BMP Spills of Oil and Hazardous Substances) which includes the following BMPs:
 - Ensure the clean up of liquid/solid spills in the loading/ unloading area immediately, if a significant spill occurs, and, upon completion of the loading/unloading activity, or, at the end of the working day.
 - Retain and maintain an appropriate oil spill cleanup kit on-site for rapid cleanup of material spills. (See BMP Spills of Oil and Hazardous Substances).
 - Ensure that an employee trained in spill containment and cleanup is present during loading/unloading.

Transfer of Small Quantities from Tanks and Containers:

- Refer to BMPs Storage of Liquids in Permanent Above-Ground Tanks, and Storage of Liquid, Food Waste, or Dangerous Waste Containers, for requirements on the transfer of small quantities from tanks and containers, respectively.

Operational Source Control BMPs for Maintenance and Repair of Vehicles and Equipment:

- Inspect for leaks all incoming vehicles, parts, and equipment stored temporarily outside.
- Use drip pans or containers under parts or vehicles that drip or that are likely to drip liquids, such as during dismantling of liquid containing parts or removal or transfer of liquids.
- Remove batteries and liquids from vehicles and equipment in designated areas designed to prevent stormwater contamination. Store cracked batteries in a covered non-leaking secondary containment system.
- Empty oil and fuel filters before disposal. Provide for proper disposal of waste oil and fuel.
- Do not pour/convey washwater, liquid waste, or other pollutant into storm drains or to surface water. Check with the local sanitary sewer authority for approval to convey to a sanitary sewer.
- Do not connect maintenance and repair shop floor drains to storm drains or to surface water. To allow for snowmelt during the winter a drainage trench with a sump for particulate collection can be installed and used only for draining the snowmelt and not for discharging any vehicular or shop pollutants.

Operational Source Control BMPs for Maintenance of Stormwater Drainage and Treatment Systems:

- Inspect and clean treatment BMPs, conveyance systems, and catch basins as needed, and determine whether improvements in O & M are needed.
- Promptly repair any deterioration threatening the structural integrity of the facilities. These include replacement of clean-out gates, catch basin lids, and rock in emergency spillways.

- Ensure that storm sewer capacities are not exceeded and that heavy sediment discharges to the sewer system are prevented.
- Regularly remove debris and sludge from BMPs used for peak-rate control, treatment, etc. and discharge to a sanitary sewer if approved by the sewer authority, or truck to a local or state government approved disposal site.
- Clean catch basins when the depth of deposits reaches 60 percent of the sump depth as measured from the bottom of basin to the invert of the lowest pipe into or out of the basin. However, in no case should there be less than six inches clearance from the debris surface to the invert of the lowest pipe. Some catch basins (for example, WSDOT Type 1L basins) may have as little as 12 inches sediment storage below the invert. These catch basins will need more frequent inspection and cleaning to prevent scouring. Where these catch basins are part of a stormwater collection and treatment system, the system owner/operator may choose to concentrate maintenance efforts on downstream control devices as part of a systems approach.
- Clean woody debris in a catch basin as frequently as needed to ensure proper operation of the catch basin.
- Post warning signs; "Dump No Waste - Drains to Ground Water," "Streams," "Lakes," or emboss on or adjacent to all storm drain inlets where practical.
- Disposal of sediments and liquids from the catch basins must comply with "Recommendations for Management of Street Wastes" described in Appendix IV-G of this volume.
- Operational Source Control BMPs for Soil Erosion and Sediment Control at Industrial Sites, Storage of Liquid, Food Waste, or Dangerous Waste Containers, Spills of Oil and Hazardous Substances, Illicit Connections to Storm Drains, Urban Streets.

Operational Source Control BMPs for Mobile Fueling of Vehicles and Heavy Equipment:

- Ensure that all mobile fueling operations are approved by the local fire department and comply with local and Washington State fire codes.
- In fueling locations that are in close proximity to sensitive aquifers, designated wetlands, wetland buffers, or other waters of the State, approval by local jurisdictions is necessary to ensure compliance with additional local requirements.
- Ensure the compliance with all 49 CFR 178 requirements for DOT 406 cargo tanker. Documentation from a Department of Transportation (DOT) Registered Inspector shall be proof of compliance.
- Ensure the presence and the constant observation/monitoring of the driver/operator at the fuel transfer location at all times during fuel transfer and ensure that the following procedures are implemented at the fuel transfer locations:
 - Locating the point of fueling at least 25 feet from the nearest storm drain or inside an impervious containment with a volumetric holding capacity equal to or greater than 110 percent of the fueling tank volume, or covering the storm drain to ensure no inflow of spilled or leaked fuel. Storm drains that convey the inflow to a spill control separator approved by the local jurisdiction and the fire department need not be covered. Potential spill/leak conveyance surfaces must be impervious and in good repair.

- Placement of a drip pan, or an absorbent pad under each fueling location prior to and during all dispensing operations. The pan (must be liquid tight) and the absorbent pad must have a capacity of 5 gallons. Spills retained in the drip pan or the pad need not be reported.
- The handling and operation of fuel transfer hoses and nozzle, drip pan(s), and absorbent pads as needed to prevent spills/leaks of fuel from reaching the ground, storm drains, and receiving waters.
- Not extending the fueling hoses across a traffic lane without fluorescent traffic cones, or equivalent devices, conspicuously placed so that all traffic is blocked from crossing the fuel hose.
- Removing the fill nozzle and cessation of filling when the automatic shut-off valve engages. Do not allow automatic shutoff fueling nozzles to be locked in the open position.
- Not "topping off" the fuel receiving equipment
- Provide the driver/operator of the fueling vehicle with:
 - Adequate flashlights or other mobile lighting to view fill openings with poor accessibility. Consult with local fire department for additional lighting requirements.
 - Two-way communication with his/her home base.
- Train the driver/operator annually in spill prevention and cleanup measures and emergency procedures. Make all employees aware of the significant liability associated with fuel spills.
- The fueling operating procedures should be properly signed and dated by the responsible manager, distributed to the operators, retained in the organization files, and made available in the event an authorized government agency requests a review.
- Ensure that the local fire department (911) and the appropriate regional office of the Department of Ecology are immediately notified in the event of any spill entering the surface or ground waters. Establish a "call down list" to ensure the rapid and proper notification of management and government officials should any significant amount of product be lost off-site. Keep the list in a protected but readily accessible location in the mobile fueling truck. The "call down list" should also pre-identify spill response contractors available in the area to ensure the rapid removal of significant product spillage into the environment.
- Maintain a minimum of the following spill clean-up materials in all fueling vehicles, that are readily available for use:
 - Non-water absorbents capable of absorbing 15 gallons of diesel fuel;
 - A storm drain plug or cover kit;
 - A non-water absorbent containment boom of a minimum 10 feet in length with a 12-gallon absorbent capacity;
 - A non-metallic shovel; and,
 - Two, five-gallon buckets with lids.
- Use automatic shutoff nozzles for dispensing the fuel. Replace automatic shut-off nozzles as recommended by the manufacturer.
- Maintain and replace equipment on fueling vehicles, particularly hoses and nozzles, at established intervals to prevent failures.

Operational Source Control BMPs for Painting/Finishing/ Coating of Vehicles/Boats/ Buildings/ Equipment:

- Train employees in the careful application of paints, finishes, and coatings to reduce misuse and over spray. Use ground or drop cloths underneath outdoor painting, scraping, sandblasting work, and properly clean and temporarily store collected debris daily.
- Do not conduct spraying, blasting, or sanding activities over open water or where wind may blow paint into water.
- Wipe up spills with rags and other absorbent materials immediately. Do not hose down the area to a storm drain or receiving water or conveyance ditch to receiving water.
- On marine dock areas sweep rather than hose down debris. Collect any hose water generated and convey to appropriate treatment and disposal.
- Use a storm drain cover, filter fabric, or similarly effective runoff control device if dust, grit, washwater, or other pollutants may escape the work area and enter a catch basin. The containment device(s) must be in place at the beginning of the workday. Collect contaminated runoff and solids and properly dispose of such wastes before removing the containment device(s) at the end of the workday.
- Use a ground cloth, pail, drum, drip pan, tarpaulin, or other protective device for activities such as paint mixing and tool cleaning outside or where spills can contaminate stormwater.
- Properly dispose of all wastes and prevent all uncontrolled releases to the air, ground or water.
- Clean brushes and tools covered with non-water-based paints, finishes, or other materials in a manner that allows collection of used solvents (e.g., paint thinner, turpentine, xylol, etc.) for recycling or proper disposal.
- Store toxic materials under cover (tarp, etc.) during precipitation events and when not in use to prevent contact with stormwater.

Operational Source Control BMPs for Parking and Storage of Vehicles and Equipment:

- If washing of a parking lot is conducted, discharge the washwater to a sanitary sewer, if allowed by the local sewer authority, or other approved wastewater treatment system, or collect it for off-site disposal.
- Do not hose down the area to a storm drain or to a receiving water. Sweep parking lots, storage areas, and driveways, regularly to collect dirt, waste, and debris.

Operational Source Control BMPs for Roof/Building Drains at Manufacturing and Commercial Buildings:

- If leachates and/or emissions from buildings are suspected sources of stormwater pollutants, then sample and analyze the stormwater draining from the building.
- If a roof/building stormwater pollutant source is identified, implement appropriate source control measures such as air pollution control equipment, selection of materials, painting galvanized surfaces, operational changes, material recycle, process changes, etc.

Operational Source Control BMPs for Soil Erosion and Sediment Control at Industrial Sites:

- Cover Practice Options:
 - Vegetative cover such as grass, trees, shrubs, on erodible soil areas; or,
 - Covering with mats such as clear plastic, jute, synthetic fiber; and/or,
 - Preservation of natural vegetation including grass, trees, shrubs, and vines,

- Structural Practice Options:
 - Vegetated swale, dike, silt fence, check dam, gravel filter berm, sedimentation basin, and proper grading.

Operational Source Control BMPs for Spills of Oil and Hazardous Substances:

- Prepare an Emergency Spill Control Plan (SCP), which includes:
 - A description of the facility including the owner's name and address;
 - The nature of the activity at the facility;
 - The general types of chemicals used or stored at the facility;
 - A site plan showing the location of storage areas for chemicals, the locations of storm drains, the areas draining to them, and the location and description of any devices to stop spills from leaving the site such as positive control valves;
 - Cleanup procedures;
 - Notification procedures to be used in the event of a spill, such as notifying key personnel. Agencies such as Ecology, local fire department, Washington State Patrol, and the local Sewer Authority, shall be notified;
 - The name of the designated person with overall spill cleanup and notification responsibility;
- Train key personnel in the implementation of the Emergency SCP. Prepare a summary of the plan and post it at appropriate points in the building, identifying the spill cleanup coordinators, location of cleanup kits, and phone numbers of regulatory agencies to be contacted in the event of a spill;
- Update the SCP regularly;
- Immediately notify Ecology and the local Sewer Authority if a spill may reach sanitary or storm sewers, ground water, or surface water, in accordance with federal and Ecology spill reporting requirements;
- Immediately clean up spills. Do not use emulsifiers for cleanup unless an appropriate disposal method for the resulting oily wastewater is implemented. Absorbent material shall not be washed down a floor drain or storm sewer; and,
- Locate emergency spill containment and cleanup kit(s) in high potential spill areas. The contents of the kit shall be appropriate for the type and quantities of chemical liquids stored at the facility.

Operational Source Control BMPs for Storage of Liquid, Food Waste, or Dangerous Waste Containers:

- Place tight-fitting lids on all containers.
- Place drip pans beneath all mounted container taps and at all potential drip and spill locations during filling and unloading of containers.
- Inspect container storage areas regularly for corrosion, structural failure, spills, leaks, overfills, and failure of piping systems. Check containers daily for leaks/spills. Replace containers, and replace and tighten bungs in drums as needed.
- Businesses accumulating Dangerous Wastes that do not contain free liquids need only to store these wastes in a sloped designated area with the containers elevated or otherwise protected from storm water runoff.

- Drums stored in an area where unauthorized persons may gain access must be secured in a manner that prevents accidental spillage, pilferage, or any unauthorized use.
- If the material is a Dangerous Waste, the business owner must comply with any additional Ecology requirements as required.
- Storage of reactive, ignitable, or flammable liquids must comply with the Uniform Fire Code.
- Cover dumpsters, or keep them under cover such as a lean-to, to prevent the entry of stormwater. Replace or repair leaking garbage dumpsters.
- Drain dumpsters and/or dumpster pads to sanitary sewer. Keep dumpster lids closed. Install waterproof liners.

Operational Source Control BMPs for Storage of Liquids in Permanent Above-ground Tanks:

- Inspect the tank containment areas regularly to identify problem components such as fittings, pipe connections, and valves, for leaks/spills, cracks, corrosion, etc.
- Place adequately sized drip pans beneath all mounted taps and drip/spill locations during filling/unloading of tanks. Valved drain tubing may be needed in mounted drip pans.
- Sweep and clean the tank storage area regularly, if paved.
- Replace or repair tanks that are leaking, corroded, or otherwise deteriorating.
- All installations shall comply with the Uniform Fire Code and the National Electric Code

Operational Source Control BMPs for Washing Vehicles/Equipment/Building Structures:

- Conduct vehicle/equipment washing in one of the following locations:
 - At a commercial washing facility in which the washing occurs in an enclosure and drains to the sanitary sewer, or
 - In a building constructed specifically for washing of vehicles and equipment, which drains to a sanitary sewer.
- Conduct outside washing operation in a designated wash area with the following features:
 - In a paved area, constructed as a spill containment pad to prevent the run-on of stormwater from adjacent areas. Slope the spill containment area so that washwater is collected in a containment pad drain system with perimeter drains, trench drains or catchment drains. Size the containment pad to extend out a minimum of four feet on all sides of the vehicles and/or equipment being washed.
 - Convey the washwater to a sump (like a grit separator) and then to a sanitary sewer (if allowed by the local Sewer Authority), or other appropriate wastewater treatment or recycle system. An NPDES permit may be required for any washwater discharge to a storm drain or receiving water after treatment. Contact the Ecology regional office for NPDES Permit requirements.
 - The containment sump must have a positive control outlet valve for spill control with live containment volume, and oil/water separation. Size the minimum live storage volume to contain the maximum expected daily washwater flow plus the sludge storage volume below the outlet pipe. The outlet valve will be shut during the washing cycle to collect the washwater in the sump. The

valve should remain shut for at least two hours following the washing operation to allow the oil and solids to separate before discharge to a sanitary sewer.

- The inlet valve in the discharge pipe should be closed when washing is not occurring, thereby preventing the entry of uncontaminated stormwater into the pretreatment/ treatment system. The stormwater can then drain into the conveyance/discharge system outside of the wash pad (essentially bypasses the washwater treatment/conveyance system). Post signs to inform people of the operation and purpose of the valve. Clean the concrete pad thoroughly until there is no foam or visible sheen in the washwater prior to closing the inlet valve and allowing uncontaminated stormwater to overflow and drain off the pad.
- Collect the washwater from building structures and convey it to appropriate treatment such as a sanitary sewer system if it contains oils, soaps, or detergents, where feasible. If the washwater does not contain oils, soaps, or detergents then it could drain to soils that have sufficient natural attenuation capacity for dust and sediment.

Additional BMPs practiced by CleanScapes:

- One yard employee is expected to clean and maintain areas of the yard during the day (See daily yard checklist in Appendix G).
- Materials, such as oils and solvents, are recycled to the maximum extent possible.

Preventive Maintenance:

- **Catch Basins** are cleaned before the depth of debris reaches 60% of the sump depth and before the top of the debris surface is within 6 inches of the outlet pipe.
- **Vehicle and Equipment Inspection:** All equipment and vehicles are inspected as part of the preventative maintenance schedule at regularly scheduled intervals based on their operating hours. Included in the process are inspections for leaking fluids such as oil, antifreeze, etc. Vehicles are also inspected by their drivers as the start of each route and equipment parking places are inspected for drips on a daily basis. Vehicles and equipment which are leaking are taken out of service and/or prevented from spilling on the ground until repaired. Maintenance intervals are as follows:

A Inspections – 150 hours
B Inspections – 300 hours
C Inspections – 1500 hours
D Inspections – 3000 hours
Annual Inspections
5 Year Inspections

If leaks are discovered during the vehicle inspection or during the daily yard checks, the leaks are immediately repaired or swept up (soaked up and then swept up). If the leak cannot be immediately repaired, the leaking material is drained or if it's a minor leak, soaked up with spill material until it can be repaired.

- Spills and leaks are cleaned up immediately (e.g., using absorbents, vacuuming, etc.) to prevent the discharge of pollutants.

Danielle, these additional BMPs (in blue below) are not showing in the DOE template but were in our original.

Additional Preventive Maintenance BMPs

The following Preventative Maintenance BMPs (VOL. IV, Section 2.1 of SWMM-WW) are practiced by CleanScapes:

- Prevent the discharge of unpermitted liquid or solid waste and sewage to ground or surface water, or to storm drains which discharge to surface water, or to the ground:
- Do not connect floor drains in potential pollutant source areas (no floor drains, except two bathroom floor drains, tied to sewer, exist at CleanScapes.)
- Conduct all oily parts cleaning, steam cleaning, or pressure washing of equipment or containers inside a building, or on an impervious contained area such as a concrete pad and direct flow to a sewer where allowed by the local sewer authority.
- Do not pave over contaminated soil unless it has been determined that ground water has not and will not be contaminated by the soil.
- Construct impervious areas that are compatible with the materials handled. Portland cement concrete, asphalt, or equivalent material may be considered.
- Remove batteries and liquids from vehicles and equipment in designated areas designed to prevent stormwater contamination. Store cracked batteries in a covered, non-leaking secondary containment system.
- Drain oil and fuel filters before disposal. Dispose of in appropriate, labeled containers.
- For the storage of liquids, use steel or plastic containers that are rigid, durable, non-absorbent, rodent-proof, resistant to corrosion, and have a close fitting cover.
- Use dumpsters for temporary storage of solid wastes.

Additional "Recommended" Preventive Maintenance BMPs currently in place at CleanScapes:

- Store potential stormwater pollutant materials inside a building or under a cover.
- Minimize the use of toxic cleaning solvents, use aqueous detergent based solutions where necessary and choose cleaning agents that can be recycled.
- Recycle waste materials such as greases, coolants, used oil, oil filters, antifreeze, cleaning solutions, batteries, hydraulic fluids, transmission fluids and degreasers.
- Do not mix dissimilar or incompatible waste liquids stored for recycling.
- Stencil warning signs at stormwater catch basins and drains.

Spill Prevention and Emergency Cleanup:

The following spill prevention and cleanup BMPs are adhered to by the CleanScapes facility.

- By the current July 1, 2010 deadline, CleanScapes will:
 - Store all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is

greater OR will omit this individual BMP if site conditions render the BMP unnecessary, infeasible, or the Permittee provides alternative and equally effective BMPs. CleanScapes will submit a SWPPP modification if necessary to justify the BMP omission.

- Paint for container painting is stored in a bermed storage room. Mixing of paint also occurs in the storage room.
- If the storage solutions above are not under cover, CleanScapes will by the July 1, 2010 deadline:
 - Prevent precipitation from accumulating in containment areas with a roof or equivalent structure or include a written plan on how it will manage and dispose of accumulated water if a containment area cover is not practical
 - OR omit this individual BMP if site conditions render the BMP unnecessary, infeasible, or the Permittee provides alternative and equally effective BMPs. CleanScapes will submit a SWPPP modification if necessary to justify the BMP omission.
- Spill kits are located within 25 feet of all fuel transfer stations and mobile fueling units. CleanScapes also maintains inside containment and clean up kits at all areas where there is a potential for fluid spills and an emergency spill trailer which is parked to the north of the maintenance bay and remains onsite unless dispatched to the field. All spill kits are checked at a minimum once per month for supplies. These kits are appropriate for the materials being handled and the size of the potential spill. At a minimum, spill kits shall include:
 - Oil absorbents capable of absorbing 15 gallons of fuel.
 - A storm drain plug or cover kit.
 - A non-water containment boom, a minimum of 10-feet in length with a 12 gallon absorbent capacity.
 - A non-metallic shovel.
 - Two five-gallon buckets with lids.

In addition, all fleet service vehicles are equipped with basic spill kits and there are drain seals mounted on the CNG barrier next to the main storm drains in the yard.

- **Fuel Nozzles:** All employees that fuel vehicles are trained to not lock diesel fueling nozzles in the open position and to not "top off" tanks. The above is not applicable for CNG fuel.
- **Storm Drains and Fueling:** 4Refuel has been instructed to block all applicable storm drains that could receive runoff from areas where fueling, during fueling. Employees are instructed to block storm drains that could receive runoff from areas where fueling if they fuel their vehicles at the mobile diesel trailer.
- **Drip Pans and Petroleum Transfer:** 4Refuel has been instructed to use drip pans or equivalent containment measures during all diesel/petroleum transfer. Drip pans and absorbents are used under or around leaky vehicles and equipment or stored indoors where feasible. Fluids are drained from equipment and vehicles prior to on-site storage or disposal.
- **Materials, equipment, and activities:** are located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas).
- **Spill Log:** The Safety Manager maintains a spill log that includes the following information for chemical and petroleum spills: date, time, amount, location, and reason for spill; date/time clean-up

completed, notifications made and staff informed. All subcontractors and personnel are instructed to report spills immediately according to the CleanScapes Spill Response Plan.

Additional Spill Prevention and Cleanup BMPs

The following Spill Prevention and Cleanup BMPs (VOL. IV, Section 2.1 of SWMM-WW) are practiced by CleanScapes:

- Immediately upon discovery of a spill, stop, contain, and clean up all spills.
- If pollutant materials are stored on site, have spill containment and cleanup kits readily accessible.
- If the spill has reached or may reach a storm drain, groundwater, or surface water, notify Ecology immediately. Notification must comply with federal spill reporting requirements. To report a spill or to determine if a spill is a substance of a reportable quantity, call the Ecology regional office and ask for an oil spill operations or hazardous waste specialist: Northwest Region 425.649.7000. Ecology requires that oil spills be reported to the National Response Center (800.424.8802) and Ecology (800.258.5990 or 1.800.OILS.911). Report all non-oil spills to 425.649.7000. If the spill has reached or may reach a sanitary or a storm sewer, notify Ecology and the local sewer authority immediately.
- Do not flush absorbent materials or other spill cleanup materials to a storm drain. Collect the contaminated absorbent material as a solid and place in appropriate disposal containers.

Employee Training

Be sure to address the following items in this section:

- **Training Content:** The content of the training is included in Appendix E. Included in the training are:
 - An overview of what is in the SWPPP.
 - How employees make a difference in complying with the SWPPP and preventing contamination of stormwater.
 - Spill response procedures, good housekeeping, maintenance requirements, and material management practices.
- **Conducting Training:** Trainings are conducted in classroom sessions or Monthly Safety Meetings by the Safety Manager. Lectures and handouts are used.
- **Frequency/schedule of training:** Employees are trained upon new hire and annually thereafter. Employees also receive refresher training at monthly safety meetings.
- **Training Log:** A log of the dates on which specific employees received training is kept in the Human Resources department. Training records are available upon request.
- **Additional Employee Training BMPs:** The following Employee Training BMPs (VOL. IV, Section 2.1 of SWMM-WW) are practiced by CleanScapes:
 - Train all employees that work in potential pollutant source areas in identifying pollutant sources to stormwater and in understanding pollutant control measures, spill response procedures, and environmentally acceptable material handling practices, particularly those related to vehicle/equipment liquids such as hydraulic fluids and vehicle/equipment cleaning.
 - Use Ecology's Environment Education Guide: Protecting Washington's Waters from Stormwater Pollution (#07-10-058), and Stormwater Discharges Associated with Industrial Activity (#99-38) as training references.

Sample Training materials can be found in Appendix E.

Inspections, Reporting, and Recordkeeping

CleanScapes' inspection program is intended to verify the accuracy of data in the SWPPP, compliance with permit requirements for inspections and recordkeeping, and assess how well the BMPs identified in this section are working. Results from monthly inspection results are discussed at the Pollution Prevention Team meetings. All visual inspections are performed by members of the SWPPP Pollution Prevention Team, as identified in Section 1.5.

- **Facility Personnel:** The inspection program includes daily walks and tasks by the yard employee (see Daily Cleanup Assignments Appendix G), ad-hoc site inspections by the Asset Controller (see Site Inspection Checklist, Appendix F), and Monthly Facility Inspections by a member of the Pollution Prevention Team (typically the Asset Controller) (see Site Inspection Checklist, Appendix F).

The VP of Operations Administration shall review the central stormwater records file annually to determine if conditions of the Permit are being met. The review will also be used to assess whether reduced monitoring is allowable. Based on the annual review, the VP of Operations Administration will complete the Annual Report to Ecology.

- **Inspection Report or Checklist:** The monthly Site Inspection Checklist, Appendix is used to conduct the inspection. The form includes a number of assessment topics which are not currently applicable to the facility. However, they are included to ensure that if they ever become applicable (which is unlikely), they will be addressed appropriately. The results of the inspection are documented on the form. The inspection components include:
 - Observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged off-site; or discharged to waters of the state, or to a storm sewer system that drains to waters of the state.
 - Observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharge(s).
 - Observations for the presence of illicit discharges such as domestic wastewater, noncontact cooling water, or process wastewater (including leachate).
 - A verification that the descriptions of potential pollutant sources required under this permit are accurate.
 - A verification that the sitemap in the SWPPP reflects current conditions.
 - An assessment of all BMPs that have been implemented, noting all of the following:
 - Effectiveness of BMPs inspected.
 - Locations of BMPs that need maintenance.
 - Reason maintenance is needed and a schedule for maintenance.
 - Locations where additional or different BMPs are needed and the rationale for the additional or different BMPs.
- **Tracking or Follow-up Procedure:** Based on the outcome of the inspection, maintenance and or corrective action may be required. The inspector will email the inspection report to the Pollution Prevention Team and to the heads of any departments that need to take action within 24 hours of the

inspection. The inspector will create a summary report and schedule of implementation of remedial actions if the site is out of compliance.

If actions are needed, and the responsible department is not clear, the inspector shall call a meeting of the Pollution Prevention Team. Any actions required immediately following the inspection will be reviewed for timely completion. Following completion of the maintenance or corrective action, the inspector shall complete the Stormwater Maintenance/Corrective Action Form Appendix B5, which is maintained in the facility's central stormwater records file by the VP of Operations Administration.

Inspection reports and the Stormwater Maintenance/Correction Action Form are reviewed at bi-monthly Pollution Prevention Team meetings, unless called more frequently by the inspector. The inspector may, at any time, call a meeting with the Pollution Prevention Team if any violations of the SWPPP are being observed.

In the event that CleanScapes is unable to comply with the terms and conditions of the permit which may endanger human health or the environment, or the facility experiences any bypass or upset which causes exceedance of any effluent limitation in the permit, CleanScapes will:

- Immediately implement its spill response plan and otherwise stop the non-compliance and correct the problem.
- Immediately notify the appropriate regional Ecology office
- Submit a detailed report within 30 days of discovery of the failure to comply.

- **Signature Requirements and Records Retention:** The VP of Operations Administration will sign all documents needed to comply with the Permit. If the VP of Operations Administration is unavailable, the Sr. VP of Human Resources, Maintenance, and Safety will sign the documents.

The documents will be stored in the location below or scanned and stored in files on the company's servers. Documents, plans, and records will be made available to the Department of Ecology within 14 days of written request.

Document, Record, or Plan	Location	Minimum storage term
Discharge monitoring reports	Office of VP of OPS Admin	5 years
Annual reports	Office of VP of OPS Admin	10 years
Copy of permit	Office of VP of OPS Admin	5 years
Copy of permit coverage letter	Office of VP of OPS Admin	5 years
Records of sampling information	Office of VP of OPS Admin	5 years
Inspection reports	Office of VP of OPS Admin	5 years
BMP maintenance records	Office of VP of OPS Admin	5 years
Copies of laboratory reports	Office of VP of OPS Admin	5 years
Stormwater Maintenance/Corrective Action Summary	Office of VP of OPS Admin	5 years
Document of compliance with permit requirements	Office of VP of OPS Admin	5 years
Onsite spills of oil or hazardous substances in greater reportable quantities	Safety Department	5 years
Employee training records	Human Resources Department	5 years
Employee training materials	Human Resources Department	5 years
Maintenance material use and disposal	Maintenance Department	3 years

Maintenance performed	Maintenance Department	3 years
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- **Certificate of Compliance:** Each inspection report shall include a certificate of compliance, signed by the inspector and the VP of Operations Administration stating that the following. "In my opinion, the site is in/out of compliance with the terms and conditions of this SWPPP and the permit." This certificate and the inspection report shall be kept with the permit and be made available for review by the Department of Ecology.

The SWPPP Certification Form can be found in Appendix D. A copy of the monthly site inspection checklist can be found in Appendix F. The daily yard checklist can be found in Appendix G.

Illicit Discharges

Process wastewater from washing vehicles or equipment, steam cleaning and/or pressure washing is not allowed to commingle with stormwater or enter storm drains. Any such water is collected in a tank for off-site disposal, or discharged to a sanitary sewer, with written approval from the local sewage authority.

During each monthly site inspection, signs of illicit discharges are looked for, especially during dry weather when stormwater isn't discharging from the site. Each monthly site inspection will include:

- Observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged off-site; or discharged to waters of the state, or to a storm sewer system that drains to waters of the state.
- Observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharge(s).
- Observations for the presence of illicit discharges such as domestic wastewater, noncontact cooling water, or process wastewater (including leachate).
 - If an illicit discharge is discovered, CleanScapes shall notify Ecology within seven days.
 - The illicit discharge will be remedied within 30 days.

3.2. Structural Source Control BMPs

Mandatory Structural Source Control BMPs required by Condition S3. of the Industrial Stormwater General Permit:

- **Grading, Berming and Curbing:** By July 1, 2010 CleanScapes will install grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations). CleanScapes will submit a SWPPP modification to omit this individual BMP if site conditions render the BMP unnecessary, infeasible or if an equally effective BMP is established.
- **Cleaning Operations:** Except for truck washing, all cleaning operations are performed indoors or outdoors, under cover, or in bermed areas that prevent stormwater runoff and run-on and also that capture any overspray. Minimal cleaning occurs on a sloped concrete pad to the north of the Maintenance Bay that leads to an oil/water separator tied into the sewer line.
- **Wash Water:** Except for mobile truck washing operations, all wash water drains to a collection system

that directs the washwater to an oil/water separator tied into the sewer system, and not to the stormwater drainage system. Mobile truck wash water is collected by Mr. Truck Wash by blocking all the nearby storm drains, pumping the wash water back into the washing vehicle, filtering and reusing the wash water.

Mandatory Structural Source Control BMPs From Ecology's Stormwater Management Manual for Western Washington:

Structural Source Control BMPs for Loading and Unloading Areas for Liquid or Solid Material:

All Loading/ Unloading Areas:

- Consistent with Uniform Fire Code requirements (Appendix IV-D R.2) and to the extent practicable, conduct unloading or loading of solids and liquids in a manufacturing building, under a roof, or lean-to, or other appropriate cover.
- Berm, dike, and/or slope the loading/unloading area to prevent run-on of stormwater and to prevent the runoff or loss of any spilled material from the area.
- Large loading areas frequently are not curbed along the shoreline. As a result, stormwater passes directly off the paved surface into surface water. Place curbs along the edge, or slope the edge such that the stormwater can flow to an internal storm drain system that leads to an approved treatment BMP.
- Pave and slope loading/unloading areas to prevent the pooling of water. The use of catch basins and drain lines within the interior of the paved area must be minimized as they will frequently be covered by material, or they should be placed in designated "alleyways" that are not covered by material, containers or equipment.

Loading and Unloading Docks:

- Install/maintain overhangs, or door skirts that enclose the trailer end (see Figures 2.4 and 2.5) to prevent contact with rainwater.
- Design the loading/unloading area with berms, sloping, etc. to prevent the run-on of stormwater.
- Retain on-site the necessary materials for rapid cleanup of spills.

Tanker Truck Transfer Areas to Above/Below-Ground Storage Tanks:

- Pave the area on which the transfer takes place. If any transferred liquid, such as gasoline, is reactive with asphalt pave the area with Portland cement concrete.
- Slope, berm, or dike the transfer area to a dead-end sump, spill containment sump, a spill control (SC) oil/water separator, or other spill control device. The minimum spill retention time should be 15 minutes at the greater flow rate of the highest fuel dispenser nozzle through-put rate, or the peak flow rate of the 6-month, 24-hour storm event over the surface of the containment pad, whichever is greater. The volume of the spill containment sump should be a minimum of 50 gallons with an adequate grit sedimentation volume.

Structural Source Control BMPs for Maintenance and Repair of Vehicles and Equipment:

- Conduct all maintenance and repair of vehicles and equipment in a building, or other covered impervious containment area that is sloped to prevent run-on of uncontaminated stormwater and runoff of contaminated stormwater.
- The maintenance of refrigeration engines in refrigerated trailers may be conducted in the parking area with due caution to avoid the release of engine or refrigeration fluids to storm drains or surface water.
- Park large mobile equipment, such as log stackers, in a designated contained area.
- The Structural Source Control BMPs for the following are also required: Fueling at Dedicated Stations; Washing and Steam Cleaning Vehicle/Equipment/Building Structures; Loading and Unloading Areas for Liquid or Solid Material; Storage of Liquids in Permanent Above-Ground Tanks; Storage of Liquid, Food Waste, or Dangerous Waste Containers; Storage or Transfer (Outside) of Solid Raw Materials, By-Products, or Finished Products; Spills of Oil and Hazardous Substances; Illicit Connections to Storm Drains.

Structural Source Control BMPs for Mobile Fueling of Vehicles and Heavy Equipment:

- Automatic fuel transfer shut-off nozzles; and,
- An adequate lighting system at the filling point.

Structural Source Control BMPs for Painting/Finishing/Coating of Equipment:

- Enclose and/or contain all work while using a spray gun or conducting sand blasting and in compliance with applicable air pollution control, OSHA, and WISHA requirements. Do not conduct outside spraying, grit blasting, or sanding activities during windy conditions which render containment ineffective.

Structural Source Control BMPs for Storage of Liquid, Food Waste, or Dangerous Waste Containers:

- Keep containers with Dangerous Waste, food waste, or other potential pollutant liquids inside a building unless this is impracticable due to site constraints or Uniform Fire Code requirements.
- Store containers in a designated area, which is covered, bermed or diked, paved and impervious in order to contain leaks and spills. The secondary containment shall be sloped to drain into a dead-end sump for the collection of leaks and small spills.
- For liquid wastes, surround the containers with a dike as illustrated in Figure 2.10. The dike must be of sufficient height to provide a volume of either 10 percent of the total enclosed container volume or 110 percent of the volume contained in the largest container, whichever is greater, or, if a single container, 110 percent of the volume of that container.
- Where material is temporarily stored in drums, a containment system can be used as illustrated, in lieu of the above system.
- Place containers mounted for direct removal of a liquid chemical for use by employees inside a containment area as described above. Use a drip pan during liquid transfer.

Structural Source Control BMPs for Storage of Liquids in Permanent Above-ground Tanks:

- Locate permanent tanks in impervious (Portland cement concrete or equivalent) secondary containment surrounded by dike or UL Approved double-walled. The dike must be of sufficient height to provide a containment volume of either 10 percent of the total enclosed tank volume or 110 percent of

the volume contained in the largest tank, whichever is greater, or, if a single tank, 110 percent of the volume of that tank.

- Slope the secondary containment to drain to a dead-end sump (optional), or equivalent, for the collection of small spills.
- Include a tank overfill protection system to minimize the risk of spillage during loading.

3.3. Treatment BMPs

Mandatory Treatment BMPs required by Condition S3. of the Industrial Stormwater General Permit
(See Condition S3.B.4.b.iii of the permit (beginning on pg. 20) for more information):

<u>Structure:</u>	Oil Water Separators
<u>Date of Implementation:</u>	In place upon tenancy
<u>Discharge Point:</u>	Sewer system
<u>Area(s) Treated:</u>	Pad north of maintenance shop, area under mobile fueling station pad
<u>Pollutants Removed:</u>	Oil & suspended solids, sediments
<u>Maintenance Requirement(s):</u>	<u>Frequency:</u>
Cleaning of OWSs is contracted out	3-4 times a year

<u>Structure:</u>	Catch basins
<u>Date of Implementation:</u>	In place upon tenancy
<u>Discharge Point:</u>	Outfalls A & B
<u>Area(s) Treated:</u>	Truck yard and container storage areas
<u>Pollutants Removed:</u>	Sediments and debris
<u>Maintenance Requirement(s):</u>	<u>Frequency:</u>
Cleaning of catch basins is contracted out. Basins fitted with filters, see below.	3-4 times a year

<u>Structure:</u>	Catch basin filters
<u>Date of Implementation:</u>	Implemented upon taking tenancy, filters changed as needed
<u>Discharge Point:</u>	Outfalls A & B
<u>Area(s) Treated:</u>	Truck yard and container storage areas
<u>Pollutants Removed:</u>	Oil, grease and sediments
<u>Maintenance Requirement(s):</u>	<u>Frequency:</u>
Filters are cleaned regularly according to manufacturers instruction and replaced as needed.	As needed

Applicable Treatment BMPs from Ecology's Stormwater Management Manual for Western WA

- **Treatment BMPs for Maintenance and Repair of Vehicles and Equipment:** Contaminated stormwater runoff from vehicle staging and maintenance areas must be conveyed to a sanitary sewer, if allowed by the local sewer authority, or to an API or CP oil and water separator followed by a basic treatment BMP, applicable filter, or other equivalent oil treatment system.

- **Treatment BMPs for Parking and Storage of Vehicles and Equipment:** CleanScapes is subject to the storage of a fleet of 25 or more diesel vehicles that are over 10 tons gross weight and is therefore considered high-use. Two oil water separators, and catch basin filters, or equivalent BMP, approved by the local jurisdiction, are in place.
- **Treatment BMPs for Storage of Liquid, Food Waste, or Dangerous Waste Containers:**
N/A – All storage containers currently kept inside or under cover.
For contaminated stormwater in the containment area, connect the sump outlet to a sanitary sewer, if approved by the local Sewer Authority, or to appropriate treatment such as an API or CP oil/water separator, catch basin filter or other appropriate system (see Volume V). Equip the sump outlet with a normally closed valve to prevent the release of spilled or leaked liquids, especially flammables (compliance with Fire Codes), and dangerous liquids. This valve may be opened only for the conveyance of contaminated stormwater to treatment. Another option for discharge of contaminated stormwater is to pump it from a dead-end sump or catchment to a tank truck or other appropriate vehicle for off-site treatment and/or disposal.
- **Treatment BMPs for Storage of Liquids in Permanent Above-ground Tanks:** If the tank containment area is uncovered, equip the outlet from the spill-containment sump with a shutoff valve, which is normally closed and may be opened, manually or automatically, only to convey contaminated stormwater to approved treatment or disposal, or to convey uncontaminated stormwater to a storm drain. Evidence of contamination can include the presence of visible sheen, color, or turbidity in the runoff, or existing or historical operational problems at the facility. Simple pH measurements with litmus or pH paper can be used for areas subject to acid or alkaline contamination.

3.4. Stormwater Peak Runoff and Volume Control BMPs

CleanScapes will, if redeveloping or adding new developments, evaluate whether flow control BMPs are necessary to satisfy the state's AKART requirements, and prevent violations of water quality standards. If flow control BMPs are required, they shall be selected according to Permit S3.A.3.

No estimate of peak runoff rate has been estimated as of yet, but since all maintenance activities are covered, these calculations may not be necessary. All stormwater from maintenance activities are isolated from the storm system, as they are kept entirely under cover and are not located within the range of a spill, to the storm system. The maintenance shop is not yet bermed to prevent runoff to the remainder of the site; however, the shop is not within a distance that a minor to medium-sized spill would reach any currently existing storm drains.

3.5. Erosion and Sediment Control BMPs

Except for the Duwamish Shoreline, a strip of grass and vegetation covering rip rap to the west of the maintenance shop and a small garden on the south side of the main building, the site is paved with either asphalt or concrete. Nearby industrial facilities cause significant dust deposition to the CleanScapes facility.

Catch basin filter inserts assist in mitigation of soil and sediment deposition, as outlined in the technical specification sheet provided in Appendix H.

Detention or retention ponds or traps

CleanScapes currently uses catch basin filter inserts/socks to minimize sediment loads in stormwater discharges due to dust. CleanScapes does not have any detention or retention ponds or traps.

Filtration BMPs

All catch basins are serviced regularly, and each contains a filter insert. The filter inserts assist with mitigation of soil and sediment. The specification sheet is provided in Appendix H.

Additional Erosion and Sediment Control BMPs

BMPs for dust control include weekly sweeping with a wet/dry sweep.

Section 4. Sampling Plan

1) Discharge Locations

Discharge ID	Common description	Discharge Type	Comments
Outfall A	Outfall SW of main building	Surface Water	Storm drains connected to Duwamish River
Outfall B	Offsite Outfall	Surface Water	Storm drains connected to Duwamish River
OWS C	Maintenance OWS	Sewer	OWS connects to sewer system
OWS D	OWS in front of main building	Sewer	OWS connects to sewer system

2) Sampling Locations

Discharge ID	Common description	Latitude (optional)	Longitude (optional)	Discharge Type	Comments
Outfall A	Outfall to SW of main building	47°32'11.05"N	122°19'28.99"W	Surface Water	Discharges to Duwamish River

Outfall A has always been the sample location, and has not been altered or moved since stormwater sampling began.

3) Substantially identical outfall exception

Outfall B is located off-site to the south of the parcel line. This outfall is substantially identical to Outfall A because the industrial activities are the same. It is therefore not sampled.

- Industrial activities conducted in the drainage area include container storage (see Appendix I for container specs), mobile fueling, and mobile truck washing. No vehicle maintenance occurs in this area.
- BMPs conducted in the drainage area of each discharge point are included in Section 3.
- There are no exposed materials located in the drainage area that are likely to be significant contributors of pollutants to stormwater discharges.
- With the exception of the aforementioned Duwamish shoreline and future garden patch the drainage area is covered with buildings, asphalt and concrete.

4) **Staff Responsible for Sampling.** SNR Company, of Duvall, WA conducts quarterly storm water discharge monitoring and reporting for CleanScapes. Erika Wittmann is the current project manager for sampling and DMR submission. She can be reached at erika@snrcompany.com. Visual inspections shall be conducted by members of the Pollution Prevention Team identified in Section 1.5.

5) **Sample Collection and Handling.** Stormwater should be sampled according to the instructions below. Sampling of stormwater will be conducted as follows:

- The stormwater from the first fall storm event (after October 1) shall be sampled.
- All samples will be a representative grab samples taken within the first 12 hours of stormwater discharge. If it is not possible to collect a sample within the first 12 hours of a stormwater discharge event, a sample will be collected as soon as is practicable after that and documentation explaining why timely samples could not have been taken will be kept with the sampling records.

- All samples will be taken as close to the point of discharge as reasonably practical.
 - The storm event sampled will be at least 0.1 inches of rain in a 24-hour period. Information regarding rainfall amounts may be found at: <http://weather.king5.com/auto/king5/WA/Seattle.html>
 - The storm event sampled will be preceded by at least 24-hours of no discharge.
 - Samples will be taken from the stormwater discharge of the first fall storm event each year.
 - Samples will be obtained from the outfall southeast of the bay entrance to the main building as shown in Figure 1 as Outfall & Sampling Location. Samples will be collected in bottles obtained from the laboratory.
 - The contract laboratory will use analytical methods defined by the Permit and EPA to perform the analysis
- 6) **Submitting Sample Results and DMRs to Ecology.** The samples will be provided to the laboratory as soon as possible and within a range of hold times where feasible, but no later than 48 hours after sampling. Chain of Custody Forms, provided by the laboratory, will accompany the samples to the laboratory.
- The samples will be kept in a cooler on ice following the sampling event and during transport to the laboratory. Expected temperature to follow within method requirements is 3-6 degrees Celsius.
 - The sampling equipment (excluding bottles provided by the laboratory) will be washed with detergent and rinsed thoroughly prior to the sampling effort, if applicable.
 - Sampling data obtained during each reporting period shall be submitted on a Discharge Monitoring Report (DMR) form provided, or otherwise approved, by *Ecology*.
 - Sampling results shall be submitted within 45 days of the end of each reporting period.
 - The first reporting period shall begin on the effective date of permit coverage.
 - DMRs shall be postmarked or received by *Ecology* by the DMR Due Dates below:

Reporting Dates and DMR Due Dates

Reporting Period	Months	DMR Due Date
1 st	January-March	May 15
2 nd	April-June	August 14
3 rd	July-Sept	November 14
4 th	October-December	February 14

- DMRs shall be submitted using *Ecology's* WebDMR system or by mail to the following address:
Department of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, Washington 98504-7696
- A DMR shall be submitted for each reporting period, whether or not the *facility* has discharged *stormwater* from the site.
- If discharge(s) occurred during normal working hours, and during safe conditions; but no sample was collected during the entire quarter, the Permittee shall submit a DMR form indicating "no sample obtained". If no discharge(s) occurred during the entire quarter or the discharges during

the quarter occurred outside normal working hours or during unsafe conditions, the Permittee shall submit a DMR indicating "no discharge".

- If sampling for a parameter is suspended due to consistent attainment, CleanScapes shall submit a DMR and indicate that it has achieved Consistent Attainment for that parameter(s).

- 7) **Sampling Parameters.** Stormwater shall be sampled for the parameters provided in Table 2. The Facility may suspend stormwater sampling and analysis for the parameters identified in Table 2 based on consistent attainment of benchmark values. Consistent attainment is defined as eight consecutive quarters (any quarter with no stormwater discharge is not counted) where the reported value for each parameter is equal to or less than the benchmark values. For pH, equal to or less than the benchmark values means that the pH did not exceed 9 and was not less than 6.

Table 2. Benchmarks and Sampling Requirements Applicable to All Facilities

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level ^a	Minimum Sampling Frequency ^b
Turbidity	NTU	25	EPA 180.1 Meter	0.5	1/quarter
pH	Standard Units	Between 5.0 and 9.0	Meter/Paper ^c	±0.5	1/quarter
Oil Sheen	Yes/No	No Visible Oil Sheen	N/A	N/A	1/quarter
Copper, Total	µg/L	Western WA: 14	EPA 200.8	2.0	1/quarter
Zinc, Total	µg/L	117	EPA 200.8	2.5	1/quarter

^a The Permittee shall ensure laboratory results comply with the *quantitation level* specified in the table. However, if a Permittee knows that an alternate, less sensitive method (higher detection level and *quantitation level*) from 40 CFR Part 136 is sufficient to produce measurable results in its effluent, it may use that method for analysis.

^b 1/quarter means 1 sample taken each quarter, year-round.

^c Permittees shall use either a calibrated pH meter or narrow-range pH indicator paper with a resolution not greater than ± 0.5 SU.

Danielle, the following corrective action section (in blue) is not part of the DOE permit. This is copied from our original SWPPP.

Response to Monitoring Results over Benchmark Values

If monitoring results exceed a benchmark value the following actions are required:

Level One Corrective Action – Operational Source Control BMPs

If a benchmark in Table 5-1 is exceeded for any parameter, CleanScapes will follow the Level One Corrective Action

- Review the SWPPP and ensure that it fully complies with Permit Condition S3, and contains the correct BMPs from the applicable Stormwater Management Manual. Do a site inspection to identify sources of pollution.
- Make appropriate revisions to the SWPPP to include additional Operational Source Control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges.

- Summarize the Level 1 Corrective Actions in the Annual Report
- Level One Deadline: Implement the revised SWPPP as soon as possible, but no later than the DMR due date for the quarter the benchmark was exceeded.

Level Two Corrective Action - Structural Source Control BMPs

If monitoring results exceed an applicable benchmark value (for a single parameter) for any two quarters during a calendar year, CleanScapes shall complete a Level 2 Corrective Action in accordance with the following:

- Review the SWPPP and ensure that it fully complies with Permit Condition S3.
- Make appropriate revisions to the SWPPP to include additional Structural Source Control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges. The Permittee shall sign and certify the revised SWPPP in accordance with S3.A.6.
- Summarize the Level 2 Corrective Actions (planned or taken) in the Annual Report
- Level Two Deadline: Implement the revised SWPPP as soon as possible, but no later than September 30th the following year.
 - If installation of necessary Structural Source Control BMPs is not feasible by September 30th the following year, Ecology may approve additional time, by approving a Modification of Permit Coverage.
 - If installation of Structural Source Control BMPs is not feasible or not necessary to prevent discharges that may cause or contribute to a violation of a water quality standard, Ecology may waive the requirement for additional Structural Source Control BMPs by approving a Modification of Permit Coverage.
 - To request a time extension or waiver, a Permittee shall submit a detailed explanation of why it is making the request (technical basis), and a Modification of Coverage form to Ecology in accordance with Condition S2.B. by June 1st prior to Level 2 Deadline. Ecology will approve or deny the request within 60 days of receipt of a complete Modification of Coverage request.

Level Three Corrective Action - Treatment BMPs

If monitoring results exceed an applicable benchmark value (for a single parameter) for any three quarters during a calendar year, CleanScapes shall complete a Level 3 Corrective Action in accordance with the following:

- Review the SWPPP and ensure that it fully complies with Permit Condition S3.
- Make appropriate revisions to the SWPPP to include additional Treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges. The Permittee shall sign and certify the revised SWPPP
 - A licensed professional engineer, geologist, hydrogeologist, or Certified Professional in Storm Water Quality (CPSWQ) shall design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.
- Summarize the Level 3 Corrective Actions (planned or taken) in the Annual Report

- **Level Three Deadline:** The Permittee shall fully implement the revised SWPPP according to Permit Condition S3 and the applicable Stormwater Management Manual as soon as possible, but no later than September 30th the following year.
 - If installation of necessary Treatment BMPs is not feasible by the Level 3 Deadline; Ecology may approve additional time by approving a Modification of Permit Coverage
 - If installation of Treatment BMPs is not feasible or not necessary to prevent discharges that may cause or contribute to violation of a water quality standard, Ecology may waive the requirement for Treatment BMPs by approving a Modification of Permit Coverage.
 - To request a time extension or waiver, a Permittee shall submit a detailed explanation of why it is making the request (technical basis), and a Modification of Coverage form to Ecology in accordance with Condition S2.B, by June 1st prior to the Level 3 Deadline. Ecology will approve or deny the request within 60 days of receipt of a complete Modification of Coverage request

Laboratory Quantitation Levels and Analytical Methods.

Laboratory quantitation levels are specified above in Table 2. An approved laboratory will be used to do the analysis and complete the laboratory reports. Analytical methods will comply with recommendations in the permit and Ecology and EPA guidelines.

Section 4. SWPPP Certification

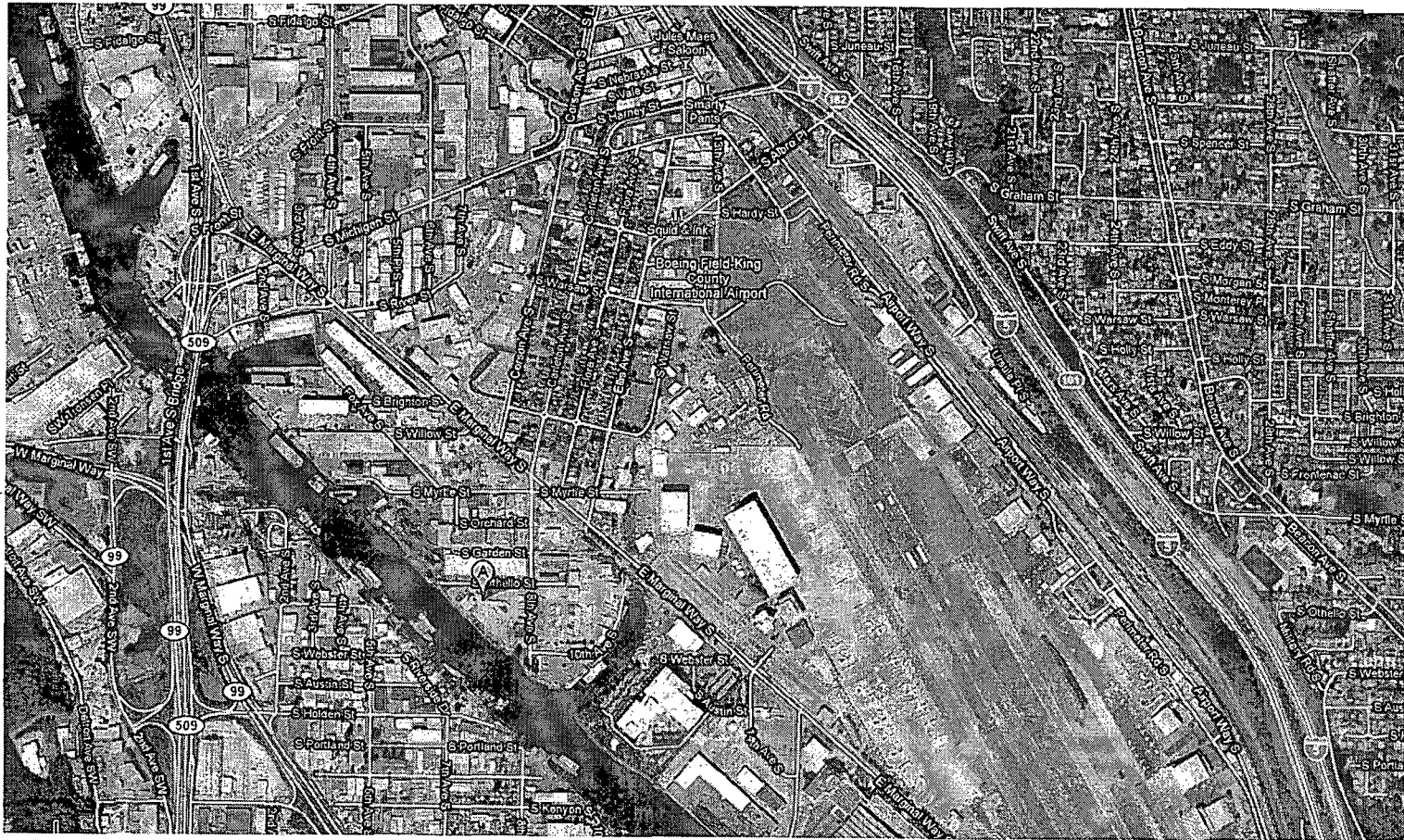
A SWPPP certification form will be completed, signed and attached to all SWPPPs. The form can be found in Appendix D of this document. Each time a Level 1, 2 or 3 Corrective Action is required the form will be re-signed, re-certified and attached to the SWPPP.

SWPPP Appendices

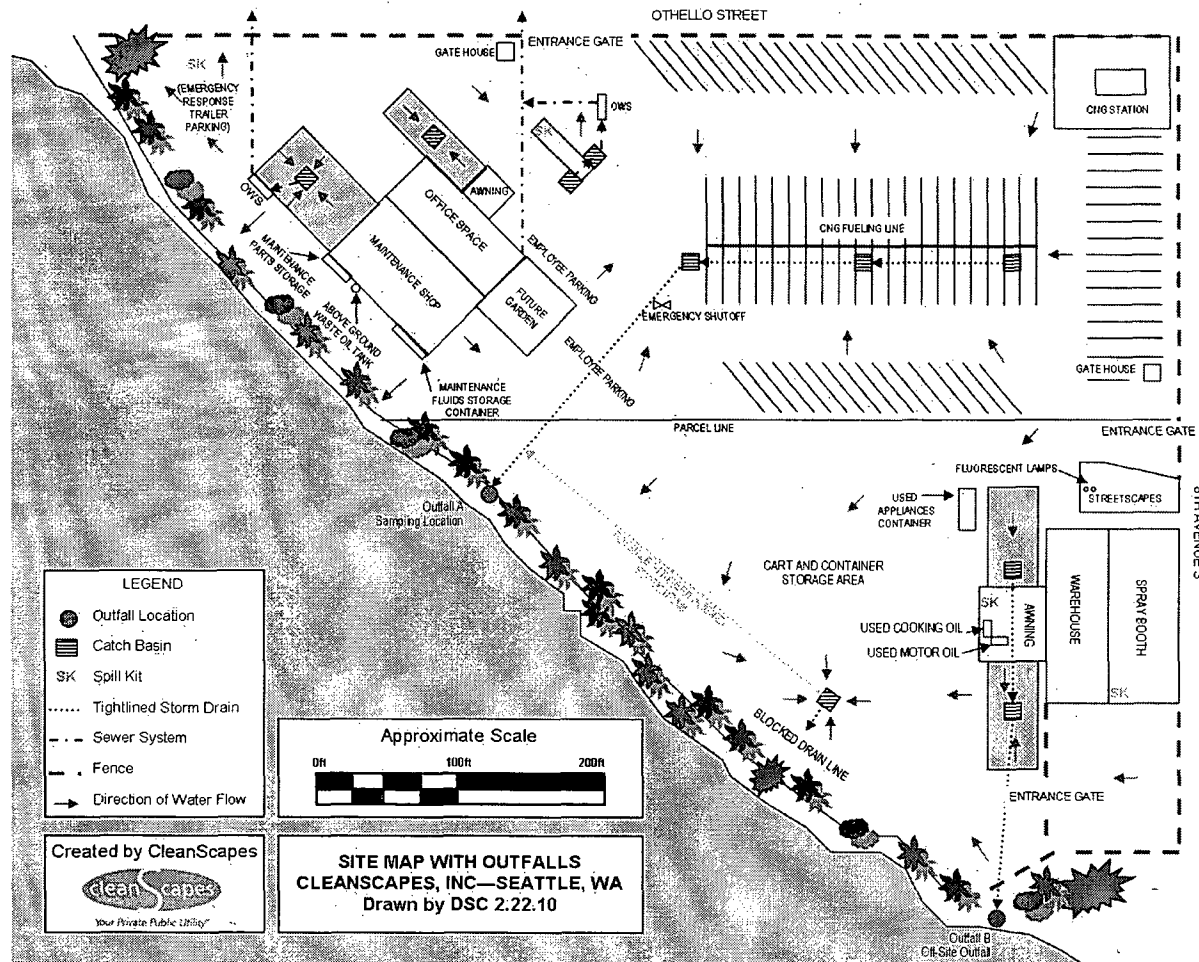
Attach the following documentation to the SWPPP:

- Appendix A** General Location Map
- Appendix B** Site Map
- Appendix C** Blank Worksheets for Development of the SWPPP
- Appendix D** SWPPP Certification or Recertification Form (for Level 1, 2, or 3 Corrective Action(s))
- Appendix E** Training Materials
- Appendix F** Industrial Stormwater Monthly Inspection Report
- Appendix G** Weekly Yard Checklist
- Appendix H** Catch Basin Filter Specs
- Appendix I** Container Specs

Appendix A: General Location Map



Appendix B: Site Map



Appendix C. Blank Worksheets for Development of the SWPPP

Note: Use these forms or create your own.

Material Inventory: Waste Streams and Materials Handled and/or Stored			
Material	Container	Removal	Recycled
7303 8th/Maintenance Shop			
15W-40 Motor oil	500 gal container with secondary spill container inside of a locked trailer	Shultz (delivers)	Y
Biomax 1000 Hydraulic fluid	500 gal container with secondary spill container inside of a locked trailer	Shultz (delivers)	Y
Pure Green CNG 15W-40	500 gal container with secondary spill container inside of a locked trailer	Shultz (delivers)	Y
Transmission fluid	500 gal container with secondary spill container inside of a locked trailer	Shultz (delivers)	N
Antifreeze	55 gal drum on a spill pallet in a locked trailer	Shultz (delivers)	N
Brake Wash	55 gal drum on a spill pallet in a locked trailer	ZEP (delivers)	N
Windshield Washer Fluid	55 gal plastic drum on a spill pallet in a locked trailer	Fleet Pride (delivers)	N
Grease	55 gal drum in a locked container	Shultz (delivers)	N
Used oil rags	1 Oily rag drum inside the Shop, 1 in StreetScapes building	Cintas	Y (washed and reused)
Used motor oil	500 gal container in shop,	Emerald Recycling Service	Y
Used transmission fluid	500 gal drum	Emerald Recycling Service	Y
Used hydraulic fluid	500 gal drum	Emerald Recycling Service	Y
Used antifreeze	55 gal drum	Emerald Recycling Service	Y
Used oil filters	55 gal drum	Emerald Recycling Service	N
Used fuel filters	55 gal drum	Emerald Recycling Service	N
Street Scapes Building			
Red Diesel #1	55 gal drums (2) each in own flammable materials locker	Shultz	Drums returned for reuse
Simple Green	55 gal drums (3, each half full due to dilution process) on a spill pallet	Empty drums taken to YFM	Y
Graffiti remover	Small quantities in flammable materials locker	Disposed of when empty	N
Laquer thinner	Small quantities in flammable materials locker	Disposed of when empty	N
Used oil rags	Oily rag drum	Cintas	Y (washed and reused)
7401 8th/Spray Booth & Loading Dock			
Paint	5g buckets kept in bermed storage room near spray booth	Disposed of when empty	N
Synthetic Thinner	5g bucket kept in bermed storage room near spray booth	Disposed of when empty	N
Used paint/Synthetic thinner	55g drum with closing funnel kept in bermed storage room near spray booth	Emerald Recycling Service	N
Used Cooking Oil	500 gal double walled container	General Biodiesel	Y
Used motor oil	500 gal container in with closing funnel in secondary spill container	Emerald Recycling Service	Y

[illegible]

[illegible]

List of Significant Spills and Leaks

Worksheet #4

Completed by:

Title:

Date: _____

List all spills and leaks (as indicated on Worksheet #2) of toxic or hazardous pollutants that were significant. Significant spills and leaks include but are not limited to, release of oil or hazardous substances in excess of reportable quantities (see chapter 2 of text). Although not required, we suggest you list spills and leaks of non-hazardous materials.

[illegible]

Comment [R1]: Do we need an example of a separate Spill Log for the Site Log book?

Spill Log

Worksheet #4A

Completed by: _____

Title: _____

Date: _____

List all chemical and petroleum spills and leaks

[illegible]

Identify Areas Associated With Industrial Activity

Worksheet #5

Completed by: _____

Title: _____

Date: _____

List areas and activities, not included on Worksheets 2, 2A, and 3, which may be sources of pollution. Discuss the potential of these areas and activities as potential pollutant sources and identify any pollutant that may be generated by that activity...

[illegible]

BMP Identification	
Worksheet #8 _____	
Completed by: _____	
Title: _____	
Date: _____	
Describe the BMPs that are needed for the facility to address existing and potential pollutant sources identified in Worksheets #3, 4, and 5.	
BMPs	Brief Description of Activities or Improvements
Good Housekeeping	
Preventive Maintenance	
Spill Prevention and Emergency Cleanup	

BMPs	Brief Description of Activities or Improvements
Inspections	
Source / Operational Control BMPs	
Erosion and Sediment Control BMPs	

<p align="center">Additional BMP Identification</p>		<p>Worksheet #8A _____</p> <p>Completed by: _____</p> <p>Title: _____</p> <p>Date: _____</p>	
		<p>Describe any treatment and innovative BMPs that are required to address existing and potential pollutant sources identified in Worksheet 3, 4, and 5. These are BMPs needed to prevent the discharge of significant amounts of pollutants despite implementation of operational and source control BMPs.</p>	
<p align="center">BMPs</p>	<p align="center">Brief Description of Activities or Improvements</p>		
<p>Treatment BMPs</p>			
<p>Emerging technologies</p> <p>Flow Control BMPs</p>			

BMP Implementation		Worksheet #9	
		Completed by: _____	
		Title: _____	
		Date: _____	
Develop a plan for implementing each BMP. Describe the steps necessary to implement the BMP (i.e., any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.			
BMPs	Description of Action(s) Required for Implementation	Schedule Milestone and Completion Date(s)	Person Responsible for Action
Good Housekeeping	1. _____	_____	_____
	2. _____	_____	_____
	3. _____	_____	_____
Preventive Maintenance	1. _____	_____	_____
	2. _____	_____	_____
	3. _____	_____	_____
	4. _____	_____	_____
Spill Prevention and Emergency Cleanup	1. _____	_____	_____
	2. _____	_____	_____
	3. _____	_____	_____
Inspections	1. _____	_____	_____
	2. _____	_____	_____
	3. _____	_____	_____

Stormwater Pollution Prevention Plan (SWPPP)
CleanScapes, Inc. February 2010

BMPs	Description of Action(s) Required for Implementation	Schedule Milestone and Completion Date(s)	Person Responsible for Action
Source Control BMPs	1.		
	2.		
	3.		
Operational Control BMPs	4.		
	5.		
	6.		
	7.		
	8.		
Erosion and Sediment Control	1.		
	2.		
	3.		
	4.		
Treatment BMPs	1.		
	2.		
	3.		
	4.		
Emerging technologies	1.		
	2.		
Flow Control BMPs	3.		
	4.		

Employee Training		Worksheet #10 _____	
		Completed by: _____	
		Title: _____	
		Date: _____	
Describe the annual training of employees on the SWPPP, addressing spill response, good housekeeping, and material management practices.			
Training Topics	Brief Description of Training Program/Materials (e.g., film, newsletter, course)	Schedule for Training (list dates)	Attendees
1.) LINE WORKERS			
Spill Prevention and Response			
Good Housekeeping			
Material Management Practices			
2.) P2 TEAM:			
SWPPP Implementation			
Monitoring Procedures			

Appendix D. SWPPP Certification Form

The Permittee shall use this form to sign and certify that the Stormwater Pollution Prevention Plan (SWPPP) is complete, accurate and in compliance with Conditions S3 and S8 of the Industrial Stormwater General Permit.

- A SWPPP certification form needs to be completed and attached to all SWPPPs.
- Each time a Level 1, 2, or 3 Corrective Action is required, this form needs to be re-signed and re-certified by the Permittee, and attached to the SWPPP.

Is this SWPPP certification in response to a Level 1, 2 or 3 Corrective Action? ☐ Yes ☐ No

If Yes:

- Type of Corrective Action?: ☐ Level 1 ☐ Level 2 ☐ Level 3
- Date SWPPP update/revision completed: _____

"I certify under penalty of law that this SWPPP and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate information to determine compliance with the Industrial Stormwater General Permit. Based on my inquiry of the person or persons who are responsible for stormwater management at my facility, this SWPPP is, to the best of my knowledge and belief, true, accurate, and complete, and in full compliance with Permit Conditions S3 and S8, including the correct Best Management Practices from the applicable Stormwater Management Manual. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Operator's Printed Name *

Title

Operator's Signature *

Date

* Federal regulations require this document to be signed as follows:

For a corporation, by a principal executive officer of at least the level of vice president;
For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
For a municipality, state, federal, or other public facility, by either a principal executive officer or ranking elected official.

This document shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above and submitted to the Ecology.
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Changes to authorization. If an authorization under number 2 above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of number 2 above shall be submitted to Ecology prior to, or together with, any reports, information, or applications to be signed by an authorized representative.

Appendix E. Training Materials

CleanScapes, Inc.

Spill Response Plan

Purpose

CleanScapes is committed to providing a safe and healthful work environment for our entire staff and the environment. In pursuit of this endeavor, the following Spill Response Plan is provided to eliminate or minimize occupational and environmental exposure to spills.

The Spill Response Plan is a key document to assist our firm in implementing and ensuring compliance with the standard, thereby protecting our employees and the environment. This Spill Response Plan includes:

- Administrative Duties
- Spill prevention
- Determination of environmental exposure
- Spill Response Process
- Spill Response Plan
- Personal protective equipment
- Housekeeping
- Communication of hazards to employees
- Training
- Recordkeeping

The methods of implementation of these elements of the standard are discussed in the subsequent pages of this Spill Response Plan.

Administrative Duties

The Safety Manager is responsible for the implementation of the Spill Response Plan. Safety Manager will maintain, review and update the Spill Response Plan at least annually and whenever necessary to include new or modified tasks and procedures.

The Safety Manager or the Operations Staff will maintain and provide all necessary personal protective equipment (PPE) as required by the standard. The Safety Manager or the Operations Staff will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

The Safety Manager or Operations Staff will be responsible for ensuring that all spill response supplies are fully stocked and available. This includes the spill kits on each vehicle, each building and the Environmental Response Unit.

The Safety Manager will be responsible for training, documentation of training, and making the written Spill Response Plan available to employees, DOE (Department of Ecology), EPA (Environmental Protection Agency) officials.

Spill Prevention

It is CleanScapes belief that the best accident and spill control is accident and spill prevention. Waste collection containers onsite are double walled or double contained in sealable containers. Employees are instructed to block storm drains that could receive runoff if fueling at the mobile diesel trailer. Fuel nozzles are not allowed to be locked in the open position, nor are fuel tanks allowed to be "topped off". Employees who regularly operate fleet vehicles are trained to know what their truck spill kits are supposed to contain, what each item is for and how to use them.

Determination of Environmental Exposure

In the event of a spill the Safety Manager or a company official will assess the situation and determine the level of impact to the environment. This includes but is not limited to the leaching of fluids into the soil and any amount of fluids that make their way to the storm drains.

Once the assessment is made the appropriate departments of local, state and federal governments will be notified. The remediation process will begin and the scope of the remediation will be determined. This includes the use of materials to recover the spill, calling a Vactor truck (if necessary) and power washing as appropriate.

Spill Response Process

A. NOTIFICATION

- Alert Route Manager/Operations Control of spill
- Determine the source of the spill and stop it (i.e. turn off the PTO pump, plug hole or shut off engine)
- Immediately alert the Maintenance Department and the Safety Manager
- Assess the scope of the spill so responders can be dispatched
- Deploy the use of the spill kit
- Contact Emergency at 911 if there is a fire or medical attention is needed
- Evaluate if you are trained, knowledgeable and equipped to handle the incident
- If spill gets into storm drain or other water body, contact agencies listed below
- First call should be to Department of Ecology (number located on Spill Response Form)
- Call the appropriate City Emergency Management Center (Shoreline, Seattle, etc.)

B. SPILL CLEAN UP

- Obtain personal protective equipment, as appropriate to the hazards. Refer to the Material Safety Data Sheet or other references for information
- Stop source of spill (upright container, plug leak, shut off pump, etc)
- Seal off storm drain with berms or drain cover and stop and spread of the spill
- Protect floor drains or other means for environmental release
- Spill socks and absorbents may be placed around drains, as needed
- Use peat moss, pads and/or granular sorbent to clean up spilled material
- Let pads sit on spill to absorb spilled material
- Make a determination if power washing is an appropriate remediation step in the process

C. SPILL & CLEAN UP MATERIAL DISPOSAL

- Loose spill control materials should be distributed over the entire spill area, working from the outside, circling to the inside. This reduces the chance of splash or spread of the spilled chemical (be aware of the tracking of materials by foot or vehicle)
- When spilled materials have been absorbed, use brush and scoop to place materials in an appropriate container (see flow chart)
- Remove spent pads and/or sorbent and dispose of properly (see flow chart)
- Call spill cleanup contractor, Vactor Truck and/or power washing unit

Additional emergency clean up and disposal procedures: All drivers and janitorial workers are trained on spill containment and prevention on an annual basis. All subcontractor and personnel are instructed to report spills immediately according to the process outlined in this document.

Spill Response Plan

Employees covered by the standard will receive an explanation of this Spill Response Plan during their initial training session. It will also be reviewed in their annual refresher training. All employees have an opportunity to review this plan at any time during their work shifts by contacting the Safety Manager. If requested, we will provide an employee with a copy of the Spill Response Plan free of charge and within 15 days of the request.

The Safety Manager is responsible for reviewing and updating the Spill Response Plan annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

The review and update of such plans must also:

- Reflect changes in technology that eliminate or reduce exposure
- Document annually consideration and implementation of appropriate devices designed to eliminate or minimize occupational/environmental exposure
- Safety Manager documents all devices considered

The Safety Manager solicits input from non-managerial employees for evaluation, and selection of effective engineering and work practice controls. Our solicitation method involves the following: (periodic conversations, problem solving groups, safety audits, inspections, investigations, analysis of data, pilot testing, and safety committees). The Operations Specialist documents all solicitation in the Spill Response Plan.

Be sure to update this list when new devices are implemented, such as after the annual review. Work practices include, but are not limited to: Washing hands immediately or as soon as feasible after removal of gloves or other personal protective equipment; Not eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses in work areas where there is a reasonable likelihood of occupational exposure; Properly disposing or decontaminating personal protective equipment; Maintaining a clean and sanitary worksite; and following an appropriate cleaning and decontamination method and schedule.

This facility identifies the need for changes in engineering control and work practices through: review of records, employee interviews, and committee activities, we evaluate the need for new procedures or new products by: A sample product is purchased and tested by one or more employees. Feedback is sought. Management makes final decision. The following staff are involved in this process: Safety Manager, Route Managers and SVP of Operations.

The Safety Manager will ensure effective implementation of these recommendations.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided by the Safety Manager in the use of the appropriate PPE for the tasks or procedures employees will perform.

The types of PPE available to employees are as follows: gloves, safety glasses, hearing protection, hard hat, boots, safety vest, safety rain coat.

PPE is located in a storage room and may be obtained through the Asset Controller.

All employees using PPE must observe the following precautions:

(Possible precautions include: Wash hands immediately or as soon as feasible after removal of gloves or other PPE. Remove PPE after it becomes contaminated, and before leaving the work area. Used PPE may be disposed of either in the trash or an appropriate laundry bag for cleaning. Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact or touching contaminated items or surfaces; replace gloves if torn, punctured, contaminated, or if their ability to function as a barrier is compromised. Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration. Never wash or decontaminate disposable gloves for reuse. Wear appropriate face and eye protection when splashes, sprays or spatters.)

The procedure for handling used PPE is as follows: PPE will either be discarded in the appropriate receptacle or cleaned by using an appropriate disinfectant.

Housekeeping

Regulated waste is placed in containers that are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see Labels section), and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling other regulated waste is: Employ the services of a disposal company that specializes in disposing of regulated waste.

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware that may be contaminated is picked up using mechanical means, such as a brush and dust pan.

Regulated waste will not be collected by our staff or vehicles. will ensure warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify Senior Vice President of Safety (Do not pick it up) if

they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

The Safety Manager will review the circumstances of all exposure incidents to determine:

Things your company might attempt to determine include: Engineering controls in use at the time, Work practices followed, A description of the device being used, Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.), Location of the incident, What task was being performed when the incident occurred, and Employee's training.

If it is determined that revisions need to be made, Phil Scott, Senior Vice President of Safety will ensure that appropriate changes are made to this Spill Response Plan. Changes include: Evaluation of safer devices.

Employee Training

All employees who have occupational/environmental exposure to fluids will receive training conducted by the Safety Manager. Our instructor(s) has the following qualifications: Multiple years of Safety Training.

All employees who have occupational/environmental exposure to Fluids will receive training on the spill remediation, prevention and potential exposures. In addition, the training program covers, at a minimum, the following elements: Safe work habits and sanitary work practices.

Training materials for this facility are available at Safety Office.

Recordkeeping

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at the Safety Office.

The training records include: the dates of the training sessions, the contents or a summary of the training sessions, the names and qualifications of persons conducting the training, and the names and job titles of all persons attending the training sessions.

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to the Safety Manager.

E2: Health & Safety Department Emergency Response Plans

Chemical spills will be handled by a third party vendor to be determined by the chemical spilled. Very specific training is required when preparing to handle emergency chemical releases. Training levels range from awareness training for first response to technical training for those with responsibility for solving problems associated with spill cleanup. **Under no circumstances does OSHA permit personnel without appropriate training to respond to a chemical spill emergency.**

The only spills that CleanScapes employees will clean up are those that present no harm or danger to the respondent.

The following information in this chapter outlines some considerations in handling a chemical spill emergency and **assumes that appropriate training has occurred.**

Your role in the event of a spill

Whether it's a solid or a liquid spill, remember that you can be exposed to toxic dust or vapor without even knowing it. If you are properly trained, respond to a hazardous chemical spill with care and speed. At CleanScapes, Inc. we will notify a 3rd party to remediate the spill if hazardous materials are involved. All CleanScapes personnel will cooperate with the emergency response team.

Spill carts and spill control stations

To deal with spills and other accidents, spill carts and spill control stations are frequently used. Response team members know the location of the carts and stations. Keep them accessible and well stocked. Spill supplies are located in the maintenance shop, the Emergency Response Trailer, the tool box on the end of the mobile fueling trailer and as part of the standard supplies on each fleet vehicle. Again, you will receive instruction and training as your job requires.

Typical items found in spill kits and spill control stations:

- Pillows, pads, socks or other materials designed to collect, neutralize, absorb or suppress hazardous liquids while picking up a spill
- Patch and plug kits
- Storm drain plugs/seals
- Brooms, shovels, mops, scrapers, squeegees and buckets
- Both acid and base neutralizers
- Temporary warning labels
- Tapes and barricades
- Coveralls, goggles & gloves
- Salvage drums and waste containers

CleanScapes, Inc. has a specific trailer that possesses the required and necessary items required to remediate a spill. The trailer is maintained and used by the maintenance department. All the above listed items can be found in the Environmental Response Unit (trailer). The response team must make sure they have the supplies and equipment they need for the work area and that they have adequate quantities.

Decontamination procedures

A decontamination plan needs to be part of every plant's emergency response effort. Equipment and PPE must be decontaminated after use. Planning ahead makes sense. Dispose of chemically contaminated waste properly.

Emergency follow-up is essential

Following an emergency, OSHA must be notified if the incident resulted in any fatalities or if three or more persons were hospitalized. If the spill is significant, the National Response Center must be notified as well. The Environmental Protection Agency regulates chemical releases into the environment.

The final activity of the emergency response team is to review and evaluate all aspects of what happened and what may happen as a result. An account of the incident must be accurate, authentic and complete so be prepared to cooperate.

Work at working safely

Remember, the best accident and spill control is accident and spill prevention. But in the event of a spill:

1. Tell any people nearby that a spill has occurred and help them get to safety
2. Report the spill to management (Ops Control, Route Manager, Safety Department)
3. Don't ignore a spill, it can produce vapors harmful or deadly to you and the environment
4. Don't endanger your own life. If fire or explosion seem imminent get out of the area

**Appendix F. Industrial Stormwater Monthly Inspection Report &
Yard Duties Daily Checklist**

INDUSTRIAL STORMWATER MONTHLY INSPECTION REPORT

Inspections must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility, and evaluate the effectiveness of best management practices required by this permit. Retain a copy of the completed and signed form in accordance with Permit Condition S9.C.

FACILITY NAME:	INSPECTION TIME:	DATE:
WEATHER INFORMATION: <ul style="list-style-type: none"> Description of Weather Conditions (e.g., sunny, cloudy, raining, snowing, etc.): <div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> Was stormwater (e.g., runoff from rain or snowmelt) flowing at outfalls and/or discharge areas shown on the Site Map during the inspection: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Comments: <div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> 		
I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION		
SWPPP and Site Map: Have a copy of the SWPPP and site map with you during the inspection so that you can ensure they are current and accurate. Use it as an aide in recording the location of any issues you identify during the inspection. <ul style="list-style-type: none"> Is the Site Map current and accurate? Is the SWPPP inventory of activities, materials and products current? <p>Any new potential pollutant sources must be added to the map and reflected in the <i>SWPPP Facility Assessment & Tables 2, 2A, 3 and 5.</i></p>	<div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; margin-bottom: 5px;"> Yes No </div>	Findings and Remedial Action Documentation: Describe any findings below and the schedule for remedial action completion including the date initiated and date completed or expected to be completed.
VEHICLE PARKING AREAS:		
Mobile fueling station: <ul style="list-style-type: none"> Is the fueling area free of contaminant buildup and evidence of chronic leaks/spills? Is the mobile fueling unit stored on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater? Are structures in place to prevent precipitation from accumulating in containment areas? <ul style="list-style-type: none"> If not, is there any water or other fluids accumulated within the containment area? Note: If containment areas are not covered to prevent water from accumulating, the SWPPP must include a plan describing how accumulated water will be managed and disposed of. 	<div style="display: flex; justify-content: space-between; border-bottom: 1px solid black; margin-bottom: 5px;"> Yes No NA </div>	Findings and Remedial Action Documentation:

Does the spill kit on the trailer contain all the permit required items? Restock if needed.

- Oil absorbents capable of absorbing 15 gallons of fuel.
- A storm drain plug or cover kit.
- A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity.
- A non-metallic shovel.
- Two five-gallon buckets with lids.
 - Are contaminated absorbent materials properly disposed of?

Employee vehicle parking area:

- Are paved surfaces free of accumulated dust/sediment and debris?
- Are all truck parking stalls free from oil spots and other liquid?
 - If no, identify which areas need cleaning:

Truck Parking Area:

- Are the three catch basin filters along the CNG line installed properly?
 - If no, identify which needs replacing or cleaning.
- Are there areas of erosion or sediment/dust sources that discharge to storm drains?
- Are paved surfaces free of accumulated dust/sediment and debris?
 - If no, which stalls or areas need sweeping/cleaning?
- Date of last quarterly vacuum/sweep
- Is the area along the fence line free from debris & garbage?
- Is the truck parking area kept in a neat and orderly condition?
- Are the waste carts emptied regularly?
- Are all truck parking stalls free from oil spots and other liquid?
 - If no, identify which stalls need cleaning.
 - Are there areas where absorbant materials are regularly used? (Report repeat offender stalls to maintenance.)
- Are good housekeeping procedures and reminders posted in appropriate locations around the yard?

STREETSCAPES BUILDING:

Equipment storage:

- Are all "bulky items" stored in the appropriate place?
- Is the area outside the building free from garbage and other

Yes No NA

Findings and Remedial Actions:

<p>objects?</p> <ul style="list-style-type: none"> • Are the city litter cans stored so that they are not collecting water? • Are the dumpster lids closed when not actively in use? • Are the lids on the spent fluorescent lamp containers sealed? • Are all containers properly labeled? 				
<p>Fluid Storage (inside building):</p> <ul style="list-style-type: none"> • Do you notice smell strange odors or experience eye, nose or throat irritation when you first enter the area? • Do you notice signs such as smoke, dirt or fumes that indicate material losses? • Are the diesel drums properly stored in their flammable materials lockers with the doors shut? • Are there empty drums? If so call Schultz to have removed. • Are all other liquids (2-cycle oil, graffiti remover, paint, etc) properly put away in their flam locker? • Does the spill pallet for the Simple Green need to be cleaned out? • Are there spots, pools, puddles or other traces of oil, grease or other chemicals on the ground either inside or out? • Is the building kept in a neat and orderly condition? 				
<p>Does the spill kit in the building contain all the required items? Restock if needed.</p> <ul style="list-style-type: none"> • Oil absorbents capable of absorbing 15 gallons of fuel. • A storm drain plug or cover kit. • A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity. • A non-metallic shovel. • Two five-gallon buckets with lids. • Are contaminated absorbent materials properly disposed of? • Are good housekeeping procedures and reminders posted in appropriate locations around the building? 				
CROSS DOCK AND CONTAINER STORAGE AREAS:				
<p>Loading Dock:</p> <ul style="list-style-type: none"> • Is the storm drain filter on the north side of the cross properly installed? • Is there any standing water around the drain? <ul style="list-style-type: none"> ◦ Does it appear to be free of debris and oil sheens? • Are paved surfaces free of accumulated dust/sediment 				

<p>and debris?</p> <ul style="list-style-type: none"> • Is the dock kept in a neat and orderly condition? • Are all containers properly labeled? • Used motor oil: <ul style="list-style-type: none"> ○ Is the area around the container free of oil stains? ○ Is the secondary containment free from leaks?? ○ Are the external surfaces free of excessive contaminant buildup? • Is the area around the used cooking oil free of oil spots? • Do the double walled containers appear to be in good working order? If not, call General Biodiesel to replace. • Is the area around the storm drain to the south of the cross dock free from leaves and other sediment debris? • Is the catch basin filter properly inserted? <p><i>Does the spill kit on the dock contain all the permit required items? Restock if needed.</i></p> <ul style="list-style-type: none"> • Oil absorbents capable of absorbing 15 gallons of fuel. • A storm drain plug or cover kit. • A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity. • A non-metallic shovel. • Two five-gallon buckets with lids. • Are contaminated absorbent materials properly disposed of? <p><i>Container Yard:</i></p> <ul style="list-style-type: none"> • Are paved surfaces free of accumulated dust/sediment and debris? • Are all dumpster and cart lids closed? • Are there any dumpsters with standing water that need to be emptied? If so, notify deliveries manager. • If there is any metal scrap is it properly stored under cover? • Are all caster and metal container parts stored under cover? • Is the container yard kept in a neat and orderly condition? • Are all empty boxes and pallets picked up? 				
MAINTENANCE SHOP				
<ul style="list-style-type: none"> • Do you notice smell strange odors or experience eye, nose or throat irritation when you first enter the area? • Do you notice signs such as smoke, dirt or fumes that 	Yes	No	NA	Findings and Remedial Actions:

<p>indicate material losses?</p> <ul style="list-style-type: none"> • Are maintenance tools, equipment and materials stored under shelter, elevated and covered? Notify Maintenance Manager if anything stored outside needs to be relocated. • Does the fluid storage container appear to be sealed and in good condition? • Are all containers properly labeled? • Is the waste oil container clean and in good working order? • Are exteriors of containers kept outside free of deposits? • Are all drums and containers of fluids stored with proper cover and containment? • Are there spots, pools, puddles or other traces of oil, grease or other chemicals on the ground either inside or out? Identify and address. • Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)? • Is the catch basin to the north of the shop in good working order? If it needs servicing notify VP Operations Administration. • Is the catch basin located underneath the office trailers in good working condition? • Is the shop kept in a neat and orderly condition? • Are good housekeeping procedures and reminders posted in appropriate locations around the shop? <p>Equipment cleaning: Is equipment washed and/or cleaned only in designated areas?</p> <ul style="list-style-type: none"> • Observe washing: Is all wash water captured and properly disposed of? <p>Do the spill kits in the shop contain all the permit required items? Restock if needed.</p> <ul style="list-style-type: none"> • Oil absorbents capable of absorbing 15 gallons of fuel. • A storm drain plug or cover kit. • A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity. • A non-metallic shovel. • Two five-gallon buckets with lids. • Are contaminated absorbent materials properly disposed of? 				
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YARD DUTIES DAILY CHECKLIST

Task	Freq.	Completion Time	Comments
LITTER/DEBRIS CLEANUP	DAILY		
TRUCK ROWS/MAIN YARD AREA			
STREETSCAPES SHED-INSIDE			
STREETSCAPES SHED-OUTSIDE, AROUND DUMPSTERS			
AROUND AND BETWEEN DUMPSTERS IN STORAGE AREA			
PARKING AREA AND ALL FOUR SIDES OF MAIN BUILDING			
ON TOP OF LOADING DOCK			
NORTH AND SOUTH SIDES OF LOADING DOCK, WHERE TRUCKS PARK			
BLOW DUST AND DIRT AWAY FROM CNG LINE AND FENCE LINE	DAILY		
CLEAN UP OIL SPOTS IN YARD:	DAILY		
TRUCK ROWS/MAIN YARD AREA			
STREETSCAPES SHED-INSIDE			
STREETSCAPES SHED-OUTSIDE, AROUND DUMPSTERS			
DUMPSTER STORAGE AREA			
PARKING AREA AND ALL FOUR SIDES OF MAIN BUILDING			
ON TOP OF LOADING DOCK			
NORTH AND SOUTH SIDES OF LOADING DOCK, WHERE TRUCKS PARK			
CHECK DRAINS FOR DEBRIS AND DIRT IN FILTERS:	DAILY		
THREE ON SOUTH SIDE OF CNG LINE			
NORTH LOADING DOCK			
SOUTH LOADING DOCK			
SHOVEL/SWEEP ALL MUD FROM AREAS AROUND FILTERS	DAILY		
THREE ON SOUTH SIDE OF CNG LINE			
NORTH LOADING DOCK			
SOUTH LOADING DOCK			
INSPECT ENTIRE YARD FOR OIL SHEEN ON TOP OF WATER AND CLEAN OIL WITH PADS IF SHEEN IS PRESENT	DAILY		
MOVE ANY SCRAP METAL TO DUMPSTER NORTH OF MAINTENANCE SHOP	DAILY		
MOVE ANY APPLIANCES SITTING OUT TO APPLIANCE DUMPSTER-CLOSE LID	DAILY		
CARDBOARD AND PALLETS GO IN THE LOADING DOCK ROLLOFF:	DAILY		
LOADING DOCK			
MAINTENANCE BAY			
FRONT OF MAIN BUILDING			
TAKE FILTERS TO NORTH OF MAINTENANCE BAY AND CLEAN THEM ABOVE THE OIL-WATER SEPARATOR	MON		
CLEAR BLACKBERRY BUSHES AND KNOTWEED ALONG THE RIVER	TUES		
CHECK FLOURESCENT BULB CONTAINER AND FILL WITH ANY BULBS FROM YARD-IF FULL, CONTACT RM	WED		
CHECK THE OIL JUG DUMPSTER-IF FULL CONTACT RM TO EMPTY	THURS		
CHECK LEVEL OF DIESEL-REPORT TO RM IF RUNNING LOW	THURS		
CHECK LEAF DUMPSTER-IF FULL, CONTACT RM	FRIDAY		
SWEEP YARD WITH MAGNET FOR LOOSE METALS	1ST FRI		

NAME: _____

DATE: _____

SIGNATURE: _____

- When fueling vehicles at the mobile fueling station, park trucks over one of the bermed openings to the oil water separator, do not lock fueling nozzles in the open position and do not "top off".

Your role in the event of a spill

Whether it's a solid or a liquid spill, remember that you can be exposed to toxic dust or vapor without even knowing it. If you are properly trained, respond to a hazardous chemical spill with care and speed. At CleanScapes, Inc. we will notify a 3rd party to remediate the spill if hazardous materials are involved. All CleanScapes personnel will cooperate with the emergency response team.

In the event of a spill the Safety Manager or a company official will assess the situation and determine the level of impact to the environment. This includes but is not limited to the leaching of fluids into the soil and any amount of fluids that make their way to the storm drains.

Once the assessment is made the appropriate departments of local, state and federal governments will be notified. The remediation process will begin and the scope of the remediation will be determined. This includes the use of materials to recover the spill, calling an educator truck (if necessary) and power washing as appropriate.

Spill Kits

Spill kits are our tool boxes for cleaning up spills and preventing them from reaching storm drains. Kits are located on every truck, in the maintenance bay, in the StreetScapes building, on the loading dock, in the tool box on the mobile fueling station and in the Emergency Response Trailer. All basic kits (as are on the trucks) should contain the following:

- Pillows, pads, socks or other materials such as peat moss designed to collect, neutralize, absorb or suppress up to 15 gallons of fuel or other hazardous liquids
- Patch and plug kits
- Salvage drums, buckets or other waste containers
- Brooms, shovels, mops, scrapers, squeegees

Where space allows there may also be:

- Storm drain plug or cover kit
- A large non-water containment boom
- Both acid and base neutralizers
- Temporary warning labels
- Tapes and barricades
- Coveralls, goggles & gloves

Spill Response Process

A. NOTIFICATION

- Alert Operations Control/your Route Manager of spill
- Determine the source of the spill and stop it (i.e. turn off the PTO pump, plug hole or shut off engine)
- Ops Control/Route Manager shall immediately alert the Maintenance Department and the Safety Manager
- Assess the scope of the spill so responders can be dispatched
- Deploy the use of the spill kit
- Contact Emergency at 911 if there is a fire or medical attention is needed
- Evaluate if you are trained, knowledgeable and equipped to handle the incident
- If spill gets into storm drain or other water body, notify Ops Control to contact the agencies listed below
- First call should be to Department of Ecology (number located on Spill Response Form)
- Call the appropriate City Emergency Management Center (Shoreline, Seattle, etc.)

B. SPILL CLEAN UP

- Obtain personal protective equipment (gloves, goggles, mask, etc), as appropriate to the hazards. Refer to the Material Safety Data Sheet or other references for information
- Stop source of spill (upright container, plug leak, shut off pump, etc)
- Seal off storm drain with berms or drain cover and stop and spread of the spill
- Protect floor drains or other means for environmental release
- Spill socks and absorbents may be placed around drains, as needed
- Use peat moss, pads and/or granular sorbent to clean up spilled material
- Let pads sit on spill to absorb spilled material
- Make a determination if power washing is an appropriate remediation step in the process

C. SPILL & CLEAN UP MATERIAL DISPOSAL

- Loose spill control materials should be distributed over the entire spill area, working from the outside, circling to the inside. This reduces the chance of splash or spread of the spilled chemical (be aware of the tracking of materials by foot or vehicle)
- When spilled materials have been absorbed, use brush and scoop to place materials in an appropriate container
- Remove spent pads and/or sorbent and dispose of properly (see flow chart)
- Call spill cleanup contractor, eductor truck and/or power washing unit

Broken Fluorescent Lamps

Fluorescent light bulbs (tubes and CFLs) contain a very small amount of mercury sealed within the glass tubing and must be treated very carefully. If a lamp breaks indoors have everyone leave the room for 15 minutes with any forced air heating/cooling system turned off and a window or door to the outside open.

For cleanup on hard surfaces:

- Carefully scoop up glass pieces and powder using stiff paper or cardboard and place them in a glass jar with metal lid (such as a canning jar) or in a sealed plastic bag.
- Use sticky tape, such as duct tape, to pick up any remaining small glass fragments and powder.
- Wipe the area clean with damp paper towels or disposable wet wipes. Place towels in the glass jar or plastic bag.
- **DO NOT USE A VACUUM OR BROOM** to clean up the broken bulb on hard surfaces. The vacuum will put mercury into the air and increase exposure. The broom will break the mercury and glass into smaller particles and spread them. The broom will also be contaminated then and no longer safe to use.
- Wash your hands thoroughly when clean up is completed.

Disposal of Clean-up Materials: Call in to Eco lights to see if broken bulbs and clean up supplies can/should be taken to them. EPA says the following:

- Immediately place all clean-up materials outdoors in a trash container or protected area for the next normal trash pickup.
- Check with your local or state government about disposal requirements in your specific area. Some states do not allow such trash disposal. Instead, they require that broken and unbroken mercury-containing bulbs be taken to a local recycling center.

Other Resources:

WA DOE Power Point

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/MUNIdocs/WebinarFinal.pdf>

Ecology pollution prevention web page

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/pollutionPREVENTION.html>

Municipal Stormwater Pollution Prevention—Everyday BMPs by Excal Visual.

Ecology will loan this training video to permittees. Contact your Regional permit manager to arrange to borrow it.

EPA: Developing your SWPPP – A Guide for Industrial Operations

http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf

Fines and Penalties

Ecology gives out penalties for not following the permit on a regular basis. A short list of recent fines is below, a full list can be found on the DOE website at <http://www.ecy.wa.gov/enforce.html>. Non-compliance is a violation of the federal clean water act and fines can range from \$10-\$27K a day. Other than the DOE, the most likely place where we are vulnerable is actually from third-party lawsuits. There are several environmental lawyers and groups (Richard Smith, Puget SoundKeeper Alliance) that when they find out about non-compliance sue the facilities.

Recent ECY penalties:

Tacoma	7/14/09	Manke Lumber, Co	Ongoing problems following its industrial stormwater permit requirements, and non-compliance with an Ecology order to correct stormwater pollution problems.	\$69,000	Kim Schmanke, 360-407
Woodinville	04/23/2009	Associated Petroleum Products	Spilled 20 gallons of gasoline to a storm drain at a Shell Station on Bostian Road on Feb. 14, 2008 due to driver inattention, and failed to promptly report the spill.	\$10,000	Larry Altose, 425-649
Longview	3/12/2009	Chinook Ventures	Multiple violations including failing to comply with an air order intended to prevent air pollution; ignoring the requirement for an updated stormwater permit; and storing materials without proper cover and controls to prevent stormwater contamination. <u>See related news release.</u>	\$150,000	Kim Schmanke, 360-407
Tacoma	1/30/2009	Hanson Pipe and Precast	Violated pollution limits outlined in its permit and allowed contaminated stormwater from the concrete plant to drain into the city stormwater system. Discharges from the city's stormwater pipes flow into fish-bearing streams and Puget Sound.	\$147,000	Kim Schmanke, 360-

			<u>See related news release.</u>		
Granite Falls	1/2/2009	Emerald Services	Allowed waste oil to overflow while filling a truck tank unattended. Spilled 10 gallons via a storm drain to a pond.	\$9,000	Larry Altose, 425-649-7009
Seattle	12/12/09	King Electrical Mfg. Co.	Discharged waste water from a paint booth and rinse tank to a city storm drain. Related news release	\$20,000	Larry Altose, 425-649-7009
Tacoma	12/6/08	Associated Petroleum Products Inc.	Violated discharge permit limits for benzene, oil and grease, zinc and total suspended solids from the petroleum tank farm.	\$112,000 <u>Related news release</u>	Kim Schmanke, 360-407-6239
Kent	3/27/2008	Univar USA, Inc.	Placed two dangerous-waste accumulation tanks containing incompatible waste within the same secondary containment. News release: http://www.ecy.wa.gov/news/2008news/2008-078.html	\$40,000	Larry Altose, 425-649-7009
Tacoma	9/7/07	Manke Lumber Co., Inc.—Tacoma Saw Mill	Failed to comply with industrial stormwater permit conditions, such as the requirement to contain soil, wood debris and industrial fluids properly, and the requirement to monitor stormwater and report results to Ecology. Oil staining on the ground was evident at several locations throughout the worksite.	\$16,000	Kim Schmanke, 360-407-6239
Tacoma	6/7/2007	Tacoma Metals, Inc;	Stored metals in open containers exposed to rain and the environment; failed to monitor and report stormwater discharges; and did not take steps to prevent polluted stormwater from draining offsite.	\$15,725	Kim Schmanke, 360-407-6239

DRAFT SWPPP/SPILL TRAINING PROCEDURE 1.18.2010

Whether you are in the yard, on a route or at home, there are two major things to take into account in the event of a spill, human safety and environmental safety. The only spills that CleanScapes employees are required to clean up are those that present no harm or danger to the respondent. CleanScapes will contract a 3rd party contractor to remediate a spill if hazardous materials are involved.

Preventing Spills

It is CleanScapes belief that the best accident and spill control is accident and spill prevention. Proper storage of all waste materials – cooking oil, used motor oil, fluorescent lamps, diesel, paint, solvents, hydraulic fluid, oil, fluorescent lamps, scrap metal, etc – must be closely monitored to ensure that they are kept in double walled, sealed containers undercover and away from any storm drains. If you see something that looks out of place, please notify the Health & Safety Department.

What is a SWPPP? What do we have to do to be in compliance?

Our ability to operate at our current facility hinges on our compliance with our Stormwater Pollution Prevention Plan, which is a mandatory requirement of all groups in need of a stormwater permit. Our SWPPP is essentially a list of best management practices that we need to comply with to keep chemicals, minerals and other toxins out of the Duwamish River which we sit adjacent to. While we have two oil water separators which are connected to the sewer system on site, the majority of the drains in our yard head straight to the river. When you are away from the yard you must assume that any drain you are near could go straight to a nearby water way and treat it as such. Everything you can do to stop a spill from getting into a storm drain should be done as long as it is safe for you to do so. In plain English, **“Only rain in the drain.”** No oil, no chemicals, no sediments or other dust and dirt, no garbage or other debris, only rain in the drain.

What are these regulations supposed to do? – Reduce potential environmental and human health impacts.

Prevent stormwater contact with other pollutants

- Minimize storage and non-essential activities
- Store materials/wastes in watertight containers
- Cover stored materials/wastes (in building, container, etc)
- Prevent run-on
- Clean up ALL spills of materials/wastes
- Monitor your vehicle for drips and leaks like your life depends on it
- Take care with the loading and unloading of materials. If possible, unloading should take place in a covered area. If there is danger of spillage, a portable berm should be set up to keep fluids contained.